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*Counsel to the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB,  
INC.,<sup>1</sup>  
Debtor.

Chapter 11

Case No. 22-10910-SHL

**SUMMARY COVER SHEET TO THE FIRST APPLICATION OF  
PACHULSKI STANG ZIEHL & JONES LLP FOR INTERIM ALLOWANCE  
OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED AS  
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE PERIOD FROM JULY 16, 2022 THROUGH OCTOBER 31, 2022**

In accordance with the Local Rules for the Southern District of New York, Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”), counsel for the Official Committee of Unsecured Creditors (the “Committee”) for the above-captioned debtor and debtor in possession (the “Debtor”), submits this summary (this “Summary”) of fees and expenses sought as actual, reasonable, and necessary in the fee application to which this Summary is attached (the

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<sup>1</sup>The last four digits of the Debtor’s federal tax identification number are 6792. The Debtor’s mailing address is 250 Bradhurst Avenue, New York, New York 10039.

“Application”)<sup>2</sup> for the period from July 16, 2022 through October 31, 2022 (the “Application Period”).

PSZJ submits the attached Application as an interim fee application in accordance with the *Order Pursuant to 11 U.S.C. §§ 105(A) and 331 Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* dated and entered August 12, 2022 [Docket No. 125] (the “Interim Compensation Order”).

Name of applicant	Pachulski Stang Ziehl & Jones LLP
Name of client	Official Committee of Unsecured Creditors
Time period covered by this application	July 16, 2022 – October 31, 2022 <sup>3</sup>
Total compensation sought this period	\$634,060.00 <sup>4</sup>
Total expenses sought this period	\$9,369.57
Petition date	June 29, 2022
Retention date	Effective as of July 16, 2022
Date of order approving employment	September 12, 2022 [Docket No. 196]
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00
Total allowed compensation paid to date	\$0
Total allowed expenses paid to date	\$0
Blended rate in this application for all attorneys	\$899.85

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<sup>2</sup> Capitalized terms used but not otherwise defined in this Summary shall have the meanings ascribed to such terms in the Application.

<sup>3</sup> PSZJ reserves the right to include any time expended in the time period indicated above in future application(s) if it is not included in this Summary or Application.

<sup>4</sup> As previously disclosed in its monthly fee statements for the months of July, August, September, and October 2022 (Docket Nos. 204, 209, 258, and 295, respectively) (the “Monthly Fee Statements”), PSZJ is utilizing its standard rates but discounting fees to the extent that attorney time exceeds \$900 per hour. Separately, no paralegal’s hourly rate exceeds \$400 per hour. Fees billed by attorneys and paralegals during the Application Period originally totaled \$808,582.00. After factoring the discount of \$174,522.00, PSZJ seeks total fees in the amount of \$634,060.00.

Blended rate in this application for all timekeepers	\$830.03
Compensation sought in this Application already paid pursuant to a monthly compensation order but not yet allowed	\$261,344.00
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed	\$4,318.66

This is a:     \_\_\_ Monthly     x Interim     \_\_\_ Final Application.

Dated: December 15, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ John W. Lucas

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In re:

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Chapter 11

Case No. 22-10910-SHL

**FIRST APPLICATION OF  
PACHULSKI STANG ZIEHL & JONES LLP FOR INTERIM ALLOWANCE  
OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED AS  
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE PERIOD FROM JULY 16, 2022 THROUGH OCTOBER 31, 2022**

Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”), attorneys for the Official Committee of Unsecured Creditors (the “Committee”) of the debtor and debtor in possession in the above-captioned case (the “Debtor”), hereby submits its first interim fee application (the “Application”) for the period from July 16, 2022 through October 31, 2022 (the “Application Period”) in accordance with the *Order Pursuant to 11 U.S.C. §§ 105(A) and 331 Establishing*

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<sup>1</sup>The last four digits of the Debtor’s federal tax identification number are 6792. The Debtor’s mailing address is 250 Bradhurst Avenue, New York, New York 10039.

*Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* dated and entered August 12, 2022 [Docket No. 125] (the “Interim Compensation Order”).

In support of the Application, PSZJ submits the declaration of John W. Lucas, attached hereto as **Exhibit A** and incorporated herein by reference. In further support of the Application, PSZJ respectfully states as follows:

**Preliminary Statement**

1. PSZJ requests (a) interim allowance and payment of compensation in the amount of \$634,060.00 for fees on account of reasonable and necessary professional services that it rendered to the Committee during the Application Period; and (b) reimbursement of actual and necessary costs and expenses in the amount of \$9,369.57.

**Jurisdiction and Basis for Relief**

2. The United States Bankruptcy Court for the Southern District of New York (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested in this Application are sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1(a) of the Local Rules for the Southern District of New York (the “Local Rules”), the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases* (the “Local Guidelines”), and the Interim Compensation Order.

### **Background**

5. On June 29, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor is operating its business and managing its properties as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this case.

6. On July 13, 2022, the Office of the United States Trustee (the “UST”) appointed the Committee pursuant to section 1102 of the Bankruptcy Code. *See Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 53].

7. On August 12, 2022, the Court entered the Interim Compensation Order, which sets forth the procedures for interim compensation and reimbursement of expenses for all retained professionals in these cases.

#### **A. PSZJ Retention**

8. On July 16, 2022, the Committee selected PSZJ as its counsel in this case. On August 15, 2022, the Committee filed *The Official Committee of Unsecured Creditors’ Application to Retain and Employ Pachulski Stang Ziehl & Jones LLP as Counsel Effective as of July 16, 2022* (the “Retention Application”) [Docket No. 130]. On September 12, 2022 the Court entered an *Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of July 16, 2022* (the “Retention Order”) [Docket No. 196]. The Retention Order authorized PSZJ to be compensated on an hourly basis, and to be reimbursed for actual and necessary out-of-pocket expenses.

#### **B. Compensation Paid and Its Source**

9. All services for which PSZJ requests compensation were performed for or on behalf of the Committee. PSZJ has received no payment and no promises for payment from

any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between PSZJ and any other person other than the partners of PSZJ for the sharing of compensation to be received for services rendered in this case. PSZJ has not received a retainer in this case.

**C. Monthly Fee Statements and Invoices for the Application Period**

10. Attached hereto as **Composite Exhibit E** is (1) a copy of PSZJ's July Monthly Fee Statement, which attaches the invoice setting forth the time-keeping entries generated by those Firm personnel who worked on this case during the period of July 16, 2022 through July 31, 2022; (2) a copy of PSZJ's August Monthly Fee Statement, which attaches the invoice setting forth the time-keeping entries generated by those Firm personnel who worked on this case during the period August 1, 2022 through August 31, 2022; (3) a copy of PSZJ's September Monthly Fee Statement, which attaches the invoice setting forth the time-keeping entries generated by those Firm personnel who worked on this case during the period September 1, 2022 through September 30, 2022; and (4) a copy of PSZJ's October Monthly Fee Statement, which attaches the invoice setting forth the time-keeping entries generated by those Firm personnel who worked on this matter during the period October 1, 2022 through October 31, 2022. PSZJ filed and served these monthly fee statements for July through October 2022 (the "Monthly Fee Statements") pursuant to the Interim Compensation Order.

11. Set forth below is a chart outlining the fees and expenses that the Debtor has paid PSZJ to date on account of PSZJ's Monthly Fee Statements and in accordance with the Interim Compensation Order:

Date Monthly Fee Statement Filed	Period Covered	Requested Fees	Requested Expenses	Fees Paid (80%)	Expenses Paid (100%)
9/20/22	7/16/22 – 7/31/22	\$127,920.00	\$291.19	\$102,336.00	\$291.19
9/20/22	8/1/22 – 8-31/22	\$198,760.00	\$4,027.47	\$159,008.00	\$4,027.47
10/24/22	9/1/22 – 9/30/22	\$134,060.00	\$1,599.53	\$0.00	\$0.00
11/21/22	10/1/22 – 10/31/22	\$173,320.00	\$3,451.38	\$0.00	\$0.00

**Statement of Services Rendered and Time Expended**

12. Pursuant to the Local Guidelines, PSZJ has classified all services it has performed for which compensation is sought for the Application Period into one of several major categories. PSZJ attempted to place the services performed in the category that best relates to the service provided. However, because certain services may relate to one or more categories, services pertaining to one category may be included in another category.

13. **Exhibit B** sets forth a timekeeper summary that includes the name, job title, bar admission date (where applicable), standard hourly billing rate, capped hourly rate in this case, total hours billed, and total compensation at the capped rate for each PSZJ professional and paraprofessional who provided services to the Committee during the Application Period. The Committee hired PSZJ on the condition that PSZJ would utilize its standard rates but discount the total fees to the extent the blended rate of PSZJ attorneys exceeds \$900.00 per hour. As provided in the PSZJ Retention Order, PSZJ paralegal hourly rates on this case will not exceed \$400.00 per hour.

14. **Exhibit C** sets forth a task code summary that includes the aggregate hours per task code spent by PSZJ professionals and paraprofessionals in rendering services to the Committee during the Application Period.



15. **Exhibit D** sets forth a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, which PSZJ has incurred in connection with services rendered to the Committee during the Application Period.

**Services Rendered and Disbursements Incurred During the Application Period**

**A. Asset Analysis/Recovery**

16. Time billed to this category relates to work regarding asset analysis and recovery issues. During the Application Period, PSZJ, among other things, addressed the recoverability of millions of dollars in allegedly restricted donations to the Debtor; conferred with the Committee's co-financial advisors regarding analysis relating to allegedly restricted donations; and studied an asset liquidation analysis in connection with its mediation posture and potential case resolution.

Fees: \$3,427.00, after discount: \$2,520.00; Hours: 2.80

**B. Appeals**

17. Time billed to this category was minimal and related to Xclaim's appeal of a Court order.

Fees: \$490.00, after discount: \$360.00; Hours: 0.40

**C. Bankruptcy Litigation**

18. PSZJ's bankruptcy litigation work during the Application Period focused on obtaining information relating to insurance coverage for the sexual abuse claims that prompted the Debtor's bankruptcy filing. PSZJ filed two Rule 2004 motions (the "2004 Motions") that sought documents from the Boys & Girls Club of America, Rockefeller University, and nearly three dozen insurers or insurance-related entities because the Debtor had evidence of insurance only reaching back to 1968 when nearly half of the known sexual abuse claims involved childhood sexual abuse committed prior to that year. Following the first hearing

on the 2004 Motions, PSZJ negotiated with counsel for dozens of parties in order to narrow the scope of the 2004 Motions and the documents the Committee sought. Those intensive negotiations resulted in three agreed forms of order that PSZJ discussed with the Court in a second hearing on the 2004 Motions. Thereafter, PSZJ issued subpoenas, conferred with subpoena parties or their counsel, analyzed insurance-related documents produced and responses to the subpoenas, and pursued additional information from subpoenaed parties where necessary.

Fees: \$322,158.50, after discount: \$262,390.00; Hours: 334.10

**D. Case Administration**

19. During the Application Period, PSZJ, among other things: maintained a memorandum of critical dates and attended to calendaring matters regarding the same; prepared applications for *pro hac vice* applications; prepared notices of appearance; analyzed the Debtor's proposed suspension order; conferred with the Committee regarding the Section 341(a) meeting and prepared materials for the Committee regarding same; and conferred with the Court-approved claims agent regarding service of pleadings.

Fees: \$11,480.00, after discount: \$9,160.00 Hours: 16.40

**E. Claims Administration/Objection**

20. Time billed to this category relates to work regarding claims administration and claims objections. During the Application Period, PSZJ, among other things: analyzed sex abuse claims with regard to insurance policies; revised the sex abuse proof of claim from; (3) provided input into the Debtor's proposed bar date motion and order, attended the hearing thereon, and conferred with the Committee about bar date issues; researched issues relating to the payment of creditor claims; and reviewed claims filed by sex abuse survivors and conferred with the Committee about those claims.

Fees: \$23,146.00, after discount: \$19,080.00; Hours: 21.20

**F. Compensation of Professionals**

21. Time billed to this category relates to work regarding the compensation of PSZJ for work it has performed in this case. During the Application Period, PSZJ, among other things: prepared its July, August, and September Monthly Fee Statements; reviewed the Court's presentment procedures relating to the Monthly Fee Statements; and conferred internally regarding this Application.

Fees: \$6,709.50, after discount: \$5,880.00 Hours: 10.70

**G. Compensation of Professionals--Others**

22. Time billed to this category relates to work regarding the compensation of professionals other than PSZJ, particularly the Committee's co-financial advisors at Island Capital Advisor LLC ("Island") and Dundon Advisers LLC ("Dundon Advisers"). During the Application Period, PSZJ, among other things: reviewed monthly fee procedures; conferred with Island and Dundon Advisers regarding fee procedures and interim fee applications; and reviewed the amended July 2022 monthly fee statement filed by one of Debtor's law firms, Pillsbury Winthrop Shaw Pittman LLP ("Pillsbury").

Fees: \$426.00, after discount: \$390.00 Hours: 0.60

**H. Financing**

23. Time billed to this category relates to work regarding financing and cash management. During the Application Period, PSZJ, among other things: conferred with its co-financial advisors at Island and Dundon Advisers (the "Committee Co-Financial Advisors") regarding mediation settlement offers; reviewed the Debtor's monthly operating reports; analyzed, conferred with the Debtor and with Committee Co-Financial Advisors, and drafted an objection in to the Debtor's debtor in possession financing motion; reviewed real estate

appraisals of Debtor-owned property; and reviewed loan documents, commitment letters and a proposed, uncontested debtor-in-possession financing order.

Fees: \$46,925.00, after discount: \$34,390.00; Hours: 38.60

**I. General Creditors Committee**

24. During the Application Period, PSZJ, among other things: analyzed case strategy issues; drafted Committee bylaws; prepared and negotiated a common interest agreement among PSZJ and Committee members' state court counsel; prepared agendas for weekly meetings with the Committee and weekly meetings with Committee members' state court counsel; prepared for and attended weekly meetings with the Committee and weekly meetings with Committee members' state court counsel; drafted minutes of Committee meetings; conferred with the UST regarding case status and employment issues; responded to Committee members' questions; conferred with the Committee Co-Financial Advisors regarding targeted tasks; conferred internally regarding sexual abuse claims and reviewed claim information; conferred with the Committee regarding mediation and settlement issues outside of scheduled weekly meetings; and crafted on settlement offers/counteroffers and term sheets.

Fees: \$160,332.50, after discount: \$125,000.00; Hours: 139.50

**J. Hearings**

25. During the Application Period, PSZJ, among other things: (1) prepared for and attended hearings on first- and second-day motions; and (2) prepared for and attended the 2004 Motion hearing.

Fees: \$7,556.00, after discount: \$5,220.00; Hours: 5.80

**K. Insurance Coverage**

26. Time billed to this category relates to work regarding insurance coverage issues. Most of this work was billed to the Bankruptcy Litigation and General Creditors

Committee categories, above. During the Application Period, PSZJ, among other things: conferred internally regarding insurance for sexual abuse claims; reviewed insurance policies and coverage; revised the Pillsbury insurance chart; conferred with Debtor's counsel regarding sex abuse insurance issues; reviewed insurance information provided by Committee members' state court counsel; reviewed financial statements referencing insurance and auditors; reviewed insurance renewal information; and conferred with the Committee regarding insurance issues.

Fees: \$14,143.00, after discount: \$10,430.00; Hours: 15.70

**L. Mediation**

27. Shortly after the Petition Date, the Committee began engaging with the Debtor in formal mediation before the Honorable Shelley C. Chapman. Nine days after the Committee hired PSZJ, PSZJ attended the first mediation session in the case. Attendant to that event, PSZJ was engaged in scheduling and discussions with potential mediation parties. Mediation in this case has been an ongoing, frequent process, often involving mediation calls multiple times a day involving PSZJ and Judge Chapman, other calls involving those parties and Debtor's counsel, and still other communications involving additional parties in interest. PSZJ prepared a detailed mediation statement with background materials and exhibits, kept in contact about mediation developments with the Committee members' state court lawyers, evaluated the Debtor's settlement proposals, attended an in-person mediation session in New York, conferred with the Committee's co-financial advisors regarding settlement terms, and devoted time to crafting counteroffers to settlement proposals.

Fees: \$150,331.00, after discount: \$111,420.00; Hours: 123.80

**M. Meeting of Creditors**

28. During the Application Period, PSZJ, among other things, (1) prepared for and attended the Section 341 meeting of creditors, and in so doing, analyzed the Debtor's Schedules and Statement of Financial Affairs.

Fees: \$12,709.00, after discount: \$8,820.00; Hours: 9.80

**N. Non-Working Travel**

29. During the Application Period, two PSZJ lawyers traveled to and from New York to attend in-person mediation.

Fees: \$16,035.00, after discount: \$11,700.00; Hours: 13.00

**O. Plan and Disclosure Statement**

30. Time billed to this category was minimal and involved a review of the Debtor's Plan exclusivity motion.

Fees: \$438.00, after discount: \$360.00; Hours: 0.40

**P. Retention of Professionals**

31. Time billed to this category relates to work regarding the retention of PSZJ as counsel to the Committee. During the Application Period, PSZJ, among other things: reviewed local rules and chamber rules in connection with retention applications; prepared its employment and retention application and related papers; finalized its conflict check; drafted pro hac vice motions; and scheduled hearings relating to retention.

Fees: \$13,391.00, after discount: \$11,440.00; Hours: 13.60

**Q. Retention of Professionals/Other**

32. Time billed to this category relates to work regarding the retention of professionals other than PSZJ. During the Application Period, PSZJ, among other things (1) reviewed Debtor's retention application; summarized for the Committee all professionals'

retention applications; addressed with the Committee the Debtor's retention of Friedman Kaplan Seiler & Adelman LLP; and drafted a retention application for a joint venture between Dundon Advisers and Island as financial advisor to the Committee.

Fees: \$16,874.50, after discount: \$14,060.00; Hours: 15.90

**R. Stay Litigation**

33. Time billed to this category relates to work regarding the automatic stay. During the Application Period, PSZJ, among other things: conferred internally regarding Second Circuit law regarding the automatic stay; researched the effect of stay against non-debtor parties to a prepetition action against a debtor; and conferred with Committee members' state court counsel regarding scope of automatic stay.

Fees: \$2,010.00, after discount: \$1,440.00; Hours: 1.60

34. The nature of work performed by PSZJ is fully set forth in Monthly Fee Statements attached at **Composite Exhibit E**. The reasonable and standard value of the services PSZJ rendered for and on behalf of the Committee during the Application Period is \$808,582.00; however, as stated above, PSZJ has voluntarily discounted to the extent the blended hourly rate of attorneys exceeds \$900.00 per hour, and paralegal rates were billed at \$400.00 per hour, thereby discounting the overall fees by \$174,522.00. Accordingly, PSZJ seeks to be compensated \$634,060.00 for the fees incurred during the Application Period.

35. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the fee amount for which PSZJ requests to be compensated by this Application is fair and reasonable given (a) the complexity of the case, (b) the time PSZJ professionals and paraprofessionals have expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services

other than in a case under the Bankruptcy Code. Moreover, PSZJ believes that this Application complies with the Local Rules, the Local Guidelines, and the Interim Compensation Order.

**Actual and Necessary Expenses Incurred by PSZJ**

36. As summarized in **Exhibit D** attached hereto, PSZJ has incurred a total of \$9,369.57 in expenses on behalf of the Committee during the Application Period and seeks reimbursement for that full amount.

37. PSZJ customarily charges \$0.20 per page for photocopying expenses, and \$0.10 per page for scanning and printing charges. PSZJ's photocopying machines automatically record the number of copies made when the person that is doing the copying enters the client's account number into a device attached to the photocopier. PSZJ summarizes each client's photocopying charges on a daily basis.

38. PSZJ charges \$0.25 per page for out-going facsimile transmissions and does not assess an additional charge for long-distance telephone calls on faxes. The charge for outgoing facsimile transmissions reflects PSZJ's calculation of the actual costs PSZJ incurs for the machines, supplies, and extra labor expenses associated with sending faxes, and is reasonable in relation to the amount charged by outside vendors who provide similar services. PSZJ does not charge the Committee for the receipt of faxes in this case.

39. With respect to providers of on-line legal research services (*e.g.*, LEXIS and Westlaw), PSZJ charges the standard usage rates these providers charge for computerized legal research. PSZJ bills its clients the actual amounts charged by such services, with no premium. Any volume discount PSZJ receives is passed on to the client.

40. PSZJ believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, PSZJ believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's



Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

**Reservation of Rights**

41. It is possible that some professional time expended or expenses that PSZJ incurred during the Application Period are not reflected in this Application. PSZJ reserves the right to include such amounts in future fee applications.

**Notice**

42. Pursuant to the Interim Compensation Order, the Application has been served upon: (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Mr. Tim McChristian); (b) Debtor's counsel: Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Esq.; Andrew M. Parlen, Esq.; John T. Weber, Esq.; and Miriam Levi, Esq.); and (c) William K. Harrington, United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz, Esq. and Tara Tiantian, Esq). PSZJ submits that, in light of the nature of the relief requested, no other or further notice need be provided.

**No Prior Request**

43. No prior application for the relief requested in this Application has been made to this or any other court.

WHEREFORE, PSZJ respectfully requests that this Court enter an order:

(a) allowing PSZJ (i) interim compensation for services rendered during the Application Period in the amount of \$634,060.00 on account of reasonable and necessary professional services rendered to and for the benefit of the Committee, and (ii) reimbursement of actual and necessary costs and expenses PSZJ has incurred in the amount of \$9,369.57; (b) authorizing and ordering

the Debtor to pay the unpaid balance owed to PSZJ in the amount of \$377,766.91; and (c) granting any other relief that this Court deems necessary and appropriate.

Dated: December 15, 2022

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ John W. Lucas*

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Chapter 11

Case No. 22-10910-SHL

**ORDER GRANTING FIRST APPLICATION OF  
PACHULSKI STANG ZIEHL & JONES LLP FOR INTERIM ALLOWANCE  
OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED AS  
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE PERIOD FROM JULY 16, 2022 THROUGH OCTOBER 31, 2022**

This matter came before the Court on the *First Application of Pachulski Stang Ziehl & Jones LLP for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred as Counsel for the Official Committee of Unsecured Creditors of the Debtor for the Period from July 16, 2022 through October 31, 2022* [Docket No. \_\_\_\_] (the “Application”), filed by Pachulski Stang Ziehl & Jones

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<sup>1</sup>The last four digits of the Debtor’s federal tax identification number are 6792. The Debtor’s mailing address is 250 Bradhurst Avenue, New York, New York 10039.

LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors. In the Application, PSZJ requests that the Court (a) allow PSZJ (i) interim compensation for services rendered during the period July 16, 2022 through October 31, 2022 (the “Application Period”) in the amount of \$634,060.00 on account of reasonable and necessary professional services rendered to and for the benefit of the Committee, and (ii) reimbursement of actual and necessary costs and expenses PSZJ has incurred in the amount of \$9,369.57; (b) authorize and order the Debtor to pay the unpaid balance owed to PSZJ in the amount of \$377,766.91; and (c) grant any other relief that this Court deems necessary and appropriate..

The Court, having considered the Application and notice of the Application appearing adequate, determines that the Application should be, and hereby is GRANTED. Accordingly,

IT IS THEREFORE ORDERED as follows:

1. The Application is GRANTED as set forth herein.
2. PSZJ’s compensation for professional services rendered during the Application Period is allowed on an interim basis in the amount of \$634,060.00.
3. Reimbursement of PSZJ’s expenses incurred during the Application Period is allowed on an interim basis in the amount of \$9,369.57.
4. The Debtor is authorized and ordered to pay the unpaid balance owed to PSZJ in the amount of \$377,766.91.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

###

**EXHIBIT A**

**Lucas Declaration**

James I. Stang (admitted *pro hac vice*)  
Iain A.W. Nasatir  
John W. Lucas  
Malhar S. Pagay (admitted *pro hac vice*)  
Gillian N. Brown  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34th Floor  
New York, NY 10017-2024  
Telephone: 212.561.7700  
Fax: 212.561.7777  
Emails: jstang@pszjlaw.com  
inasatir@pszjlaw.com  
jlucas@pszjlaw.com  
mpagay@pszjlaw.com  
gbrown@pszjlaw.com

*Counsel to the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB,  
INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 22-10910-SHL

**DECLARATION OF JOHN W. LUCAS IN SUPPORT OF FIRST APPLICATION  
OF PACHULSKI STANG ZIEHL & JONES LLP FOR INTERIM ALLOWANCE  
OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED AS  
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR THE PERIOD FROM JULY 16, 2022 THROUGH OCTOBER 31, 2022**

I, John W. Lucas, declare under penalty of perjury pursuant to 28 U.S.C. § 1746  
and pursuant to Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016-1(a) of  
the Local Rules for the Bankruptcy Court for the Southern District of New York that the  
following is true and correct:

---

<sup>1</sup>The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250  
Bradhurst Avenue, New York, New York 10039.

1. I am a partner in the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”), with an office located at, among other locations, 780 Third Avenue, 34th Floor; New York, New York 10017. I am duly admitted to practice law in the State of New York.

2. I have personally reviewed the information contained in the Application, and believe its contents to be true and correct to the best of my knowledge, information, and belief. In addition, I believe that the Application complies with the Local Rules for the Southern District of New York, the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases*, and the *Order Pursuant to 11 U.S.C. §§ 105(A) and 331 Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* dated and entered August 12, 2022 [Docket No. 125].

Executed this 15th day of December, 2022 at San Francisco, California.

  
\_\_\_\_\_  
John W. Lucas

**EXHIBIT B**

**Timekeeper Summary**



**EXHIBIT B**

**Timekeeper Summary**

NAME OF PROFESSIONAL	TITLE	YEAR ADMITTED	STANDARD HOURLY RATE (\$)	CAPPED HOURLY RATE IN THIS CASE (\$)	TOTAL HOURS BILLED	TOTAL COMPENSATION AT CAPPED RATE (\$)
James I. Stang	Partner	1980	1,525.00	900.00	63.90	57,510.00
Jeffrey N. Pomerantz	Partner	1989	1,445.00	900.00	0.30	270.00
Kenneth H. Brown	Partner	1981	1,395.00	900.00	0.50	450.00
Iain A. W. Nasatir	Partner	1983	1,295.00	900.00	119.60	107,640.00
Maxim B. Litvak	Partner	1997	1,275.00	900.00	18.10	16,290.00
Malhar S. Pagay	Partner	1997	1,095.00	900.00	143.30	128,970.00
John W. Lucas	Partner	2005	1,095.00	900.00	202.40	182,160.00
Beth E. Levine	Counsel	1993	1,045.00	900.00	3.20	2,880.00
Robert M. Saunders	Counsel	1984	1,025.00	900.00	3.90	3,510.00
Gina F. Brandt	Counsel	1976	995.00	900.00	1.20	1,080.00
Gillian N. Brown	Counsel	1999	925.00	900.00	100.00	90,000.00
Steven W. Golden	Associate	2015	775.00	N/A	0.80	620.00
Leslie A. Forrester	Law Library Director	N/A	495.00	400.00	3.10	1,240.00
Beth D. Dassa	Paralegal	N/A	495.00	400.00	35.90	14,360.00
Patricia J. Jeffries	Paralegal	N/A	495.00	400.00	17.30	6,920.00
La Asia S. Canty	Paralegal	N/A	495.00	400.00	1.50	600.00
Kerri L. LaBrada	Paralegal	N/A	495.00	400.00	21.20	8,480.00
Michael A. Matteo	Paralegal	N/A	460.00	400.00	27.70	11,080.00
<b>Total</b>					<b>763.90</b>	<b>634,060.00</b>

**EXHIBIT C**

**Task Code Summary**

## EXHIBIT C

### Task Code Summary

<b>Code</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
AA	Asset Analysis/Recovery	2.80	\$3,427.00
AP	Appeals	0.40	\$490.00
BL	Bankruptcy Litigation	334.10	\$322,158.50
CA	Case Administration	16.40	\$11,480.00
CO	Claims Admin/Objections	21.20	\$23,146.00
CP	Compensation of Professionals	10.70	\$6,709.50
CPO	Compensation of Prof./Others	0.60	\$426.00
FN	Financing	38.60	\$46,925.00
GC	General Creditors Committee	139.50	\$160,332.50
H	Hearing	5.80	\$7,556.00
IC	Insurance Coverage	15.70	\$14,143.00
ME	Mediation	123.8	\$150,331.00
MC	Meeting of Creditors	9.80	\$12,709.00
NT	Non-Working Travel	13.00	\$16,035.00
PD	Plan & Disclosure Statement	0.40	\$438.00
RP	Retention of Professional	13.60	\$13,391.00
RPO	Retention of Professional/Other	15.90	\$16,874.50
SL	Stay Litigation	1.60	\$2,010.00
<b>Total</b>		<b>763.90</b>	\$808,582.00 less discount of \$174,522.00 for a total fee request of <b>\$634,060.00</b>

**EXHIBIT D**

**Disbursement Summary**

**EXHIBIT D**

**Disbursement Summary**

<b>Expenses (by Category)</b>	<b>Amounts</b>
Air Fare	\$450.00
Bloomberg	\$10.00
Delivery/Courier Service	\$2,434.77
Facsimiles	\$35.00
Federal Express	\$2,210.50
Filing Fee	\$400.00
Legal Research – Lexis Nexis	\$691.15
Outside Services	\$1,214.65
Postage	\$228.00
Reproduction Expense	\$547.80
Reproduction/ Scan Copy	\$211.70
Research	\$500.00
Transcript	\$436.00
<b>Total</b>	<b>\$9,369.57</b>

**COMPOSITE EXHIBIT E**

**Monthly Fee Statements**

**Objection Deadline: October 5, 2022 at 4pm ET**

James I. Stang (admitted *pro hac vice*)  
John W. Lucas  
Malhar S. Pagay (admitted *pro hac vice*)  
Gillian N. Brown  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34th Floor  
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jlucas@pszjlaw.com  
mpagay@pszjlaw.com  
gbrown@pszjlaw.com

*Counsel to the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X
	:
In re	: Chapter 11
	:
MADISON SQUARE BOYS & GIRLS CLUB, INC., <sup>1</sup>	: Case No. 22-10910-SHL
	:
Debtor.	:
	:
-----	X

**FIRST MONTHLY FEE STATEMENT OF  
PACHULSKI STANG ZIEHL & JONES LLP FOR  
COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR THE PERIOD FROM JULY 16, 2022 THROUGH JULY 31, 2022**

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<sup>1</sup>The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional:	Official Committee of Unsecured Creditors
Services to:	Official Committee of Unsecured Creditors
Date of Retention:	July 16, 2022
Period for which compensation and reimbursement is sought:	July 16, 2022 through July 31, 2022
Monthly Fees Incurred	\$159,773.00
Fee Reduction	(\$31,853.00) <sup>2</sup>
Fees (After Reduction)	\$127,920.00
20% Holdback:	\$25,584.00
Total Fees Less 20% Holdback:	\$102,336.00
Monthly Expenses Incurred:	\$291.19
Total Fees and Expenses Due:	\$102,627.19

This is a   X   monthly       interim       final application

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), the *Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to*

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<sup>2</sup> As disclosed in the Firm’s employment application, the Firm is utilizing rates that are reduced from standard rates so that attorney time is capped at \$900 per hour and paralegal time is capped at \$400 per hour. The reduction set forth in this Fee Statement here accounts for the reduction from the following standard rates, as set forth in Exhibit A hereto: J. Stang (\$1,525); M. Pagay (\$1,095); J. Lucas (\$1,095); G. Brown (\$925); Patricia J. Jeffries (\$490); La Asia S. Canty (\$400); Kerri L. LaBrada (\$400); and Michael A. Matteo (\$460).



*the Official Committee of Unsecured Creditors Effective as of July 16, 2022* [Docket No. 196] (the “PSZJ Retention Order”), and the *Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [Docket No. 125] (the “Interim Compensation Order”),<sup>3</sup> Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors (the “Committee”) hereby submits this first monthly fee statement (the “Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Committee in this chapter 11 case (the “Case”) during the period July 16, 2022 to July 31, 2022 (the “Fee Period”).

By this Fee Statement, PSZJ seeks payment in the amount of \$102,627.19, comprised of the following: (i) \$102,336.00, which is eighty percent (80%) of the total amount of fees incurred for actual and necessary services rendered during the Fee Period, and (ii) reimbursement of \$291.19, which is one hundred percent (100%) of actual and necessary expenses that PSZJ incurred in connection with its representation of the Committee during the Fee Period.

### **Services Rendered and Expenses Incurred**

1. Attached as **Exhibit A** is a summary of PSZJ’s professionals by individual, setting forth the (i) name and title of each individual who provided services in connection with this chapter 11 case during the Fee Period, (ii) the year of bar admission for each PSZJ attorney, (iii) current, standard hourly billing rate for each individual at PSZJ working on this chapter 11 case during the Fee Period, (iv) the capped hourly rate for those individuals, and (v) the total fees that each individual billed to this Case during the Fee Period at the applicable capped billing rate. The Committee hired PSZJ on the condition that the total fees incurred would be discounted

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<sup>3</sup> Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

to the extent the blended rate of PSZJ attorneys exceeds \$900.00 per hour. As provided in the PSZJ Retention Order, PSZJ paralegals on this Case do not exceed \$400.00 per hour. All of the PSZJ paralegals who worked on this Case during the Fee Period have standard billing rates in excess of \$400.00 per hour. PSZJ is providing a reduction in fees for the Fee Period in the amount of \$31,853.00.

2. Attached as **Exhibit B** is a summary of the services PSZJ rendered during the Fee Period and the compensation it seeks, by project category.

3. Attached as **Exhibit C** is a summary of expenses that PSZJ incurred during the Fee Period and for which it seeks reimbursement.

4. Attached as **Exhibit D** is itemized time detail of PSZJ professionals during the Fee Period and summary materials related thereto.

#### **Notice and Objection Procedures**

5. Notice of this Fee Statement shall be given by hand or overnight delivery, or by email where available, upon (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Tim McChristian); (b) Debtor's counsel: Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Andrew M. Parlen, John T. Weber); and (c) William K. Harrington, United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz and Tara Tiantian) (together with PSZJ, at the mailing or email addresses set forth on the caption page of this Fee Statement, the "Notice Parties").

6. Objections to this Fee Statement, if any, must be filed with the Court and served upon PSZJ and the other Notice Parties (set forth at para. 5, above) so as to be received no later

than **fifteen (15) calendar days after filing of Fee Statement** (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

7. If no Objections to this Fee Statement are filed and served as set forth above, the Debtor shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses set forth in this Fee Statement.

8. If an Objection to this Fee Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. *See* Docket No. 125. To the extent such an Objection is not resolved between PSZJ and the party filing the Objection, the Objection shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: September 20, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/Gillian N. Brown

James I. Stang (admitted *pro hac vice*)

John W. Lucas

Malhar S. Pagay (admitted *pro hac vice*)

Gillian N. Brown

780 Third Avenue, 34th Floor

New York, NY 10017-2024

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Emails: jstang@pszjlaw.com

jlucas@pszjlaw.com

mpagay@pszjlaw.com

gbrown@pszjlaw.com

*Counsel to the Official Committee of Unsecured  
Creditors*

**EXHIBIT A**

**Compensation by Professional**

**SUMMARY OF COMPENSATION BY PROFESSIONAL  
FOR SERVICES RENDERED FOR THE PERIOD  
JULY 16, 2022- JULY 31, 2022**

<b>Name of Professional Partners and Counsel</b>	<b>Title</b>	<b>Year Admitted</b>	<b>Standard Hourly Rate (\$)</b>	<b>Capped Hourly Rate in this Case (\$)</b>	<b>Total Billed Hours</b>	<b>Total Compensation at Capped Rate (\$)</b>
James I. Stang	Partner	1980	1,525.00	900.00	15.30	13,770.00
Malhar S. Pagay	Partner	1997	1,095.00	900.00	48.60	43,740.00
John W. Lucas	Partner	2005	1,095.00	900.00	56.80	51,120.00
Gillian N. Brown	Counsel	1999	925.00	900.00	14.90	13,410.00
<b>Total Partners and Counsel:</b>					<b>135.60</b>	<b>\$122,040.00</b>

<b>Name of Paralegals and Other Non-Legal Staff</b>	<b>Standard Hourly Billing Rate (\$)</b>	<b>Capped Hourly Rate in this Case (\$)</b>	<b>Total Billed Hours</b>	<b>Total Compensation at Capped Rate (\$)</b>
Patricia J. Jeffries	495.00	400.00	9.90	3,960.00
Kerri L. LaBrada	495.00	400.00	3.70	1,480.00
La Asia S. Canty	495.00	400.00	0.20	80.00
Mike Matteo	460.00	400.00	0.90	360.00
<b>Total Paralegals and Other Non-Legal Staff:</b>			<b>14.70</b>	<b>\$5,880.00</b>

<b>ALL PROFESSIONALS</b>	<b>DISCOUNTED/CAPPED BLENDED RATE (\$)</b>	<b>TOTAL BILLED HOURS</b>	<b>TOTAL COMPENSATION (\$)</b>
Partners and Counsel	122,040.00	135.60	122,040.00
Paralegals/Non-Legal Staff	5,880.00	14.70	5,880.00
<b>Total Fees Incurred</b>			<b>\$127,920.00</b>

**EXHIBIT B**

**Compensation by Task Code**

**AGGREGATE TIME SUMMARY BY TASK CODE  
FOR THE PERIOD JULY 16, 2022 - JULY 31, 2022**

<b>Task Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees (\$)</b>
AA	Asset Analysis and Recovery	1.20	1,443.00
BL	Bankruptcy Litigation	54.50	52,295.50
CA	Case Administration	4.70	4,152.50
CO	Claims Admin/Objections	4.10	4,455.50
GC	General Creditors' Committee	41.00	47,120.00
H	Hearings	3.00	3,930.00
IC	Insurance Coverage	2.60	2,156.50
ME	Mediation	23.50	26,902.50
RP	Retention of Professionals	7.00	7,507.00
RPO	Retention of Professionals/Others	7.40	8,258.00
SL	Stay Litigation	1.30	1,552.50
	<b>TOTAL</b>	<b>150.30</b>	<b>\$159,773.00</b>

**EXHIBIT C**

**Expense Summary**



**AGGREGATE ITEMIZED EXPENSES FOR THE PERIOD  
JULY 16, 2022 - JULY 31, 2022**

<b>Expenses Category</b>	<b>Total Expenses (\$)</b>
Filing Fee	200.00
Lexis/Nexis Legal Research	10.54
Outside Services	80.65
<b>TOTAL</b>	<b>\$291.19</b>

**EXHIBIT D**

**Itemized Time Detail for the Fee Period**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

July 31, 2022

Invoice 130635

Client 54162

Matter 00004

**GNB**

GNB

RE: Committee Representaton

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 07/31/2022**

FEES	\$159,773.00
EXPENSES	\$291.19
LESS COURTESY DISCOUNT	\$31,853.00
<b>TOTAL CURRENT CHARGES</b>	<b>\$128,211.19</b>
<b>TOTAL BALANCE DUE</b>	<b>\$128,211.19</b>

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
54162 - 00004

Page: 2  
Invoice 130635  
July 31, 2022

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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GNB	Brown, Gillian N.	Counsel	925.00	14.90	\$13,782.50
JIS	Stang, James I.	Partner	1525.00	15.30	\$23,332.50
JWL	Lucas, John W.	Partner	1095.00	56.80	\$62,196.00
KLL	LaBrada, Kerri L.	Paralegal	495.00	3.70	\$1,831.50
LSC	Canty, La Asia S.	Paralegal	495.00	0.20	\$99.00
MAM	Matteo, Mike A.	Paralegal	460.00	0.90	\$414.00
MSP	Pagay, Malhar S.	Partner	1095.00	48.60	\$53,217.00
PJJ	Jeffries, Patricia J.	Paralegal	495.00	9.90	\$4,900.50
				<hr/> 150.30	<hr/> \$159,773.00

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
54162 - 00004

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Invoice 130635  
July 31, 2022

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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	1.20	\$1,443.00
BL	Bankruptcy Litigation [L430]	54.50	\$52,295.50
CA	Case Administration [B110]	4.70	\$4,152.50
CO	Claims Admin/Objections[B310]	4.10	\$4,455.50
GC	General Creditors Comm. [B150]	41.00	\$47,120.00
H	Hearings	3.00	\$3,930.00
IC	Insurance Coverage	2.60	\$2,156.50
ME	Mediation	23.50	\$26,902.50
RP	Retention of Prof. [B160]	7.00	\$7,507.00
RPO	Ret. of Prof./Other	7.40	\$8,258.00
SL	Stay Litigation [B140]	1.30	\$1,552.50
		150.30	<hr/> \$159,773.00

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
54162 - 00004

Page: 4  
Invoice 130635  
July 31, 2022

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**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Filing Fee [E112]	\$200.00
Lexis/Nexis- Legal Research [E	\$10.54
Outside Services	\$80.65
	<hr/>
	\$291.19

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
54162 - 00004

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Invoice 130635  
July 31, 2022

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
07/24/2022	MSP	AA	Review donor restriction issues (.6); email exchange with James I. Stang, Iain Nasatir, et al. re: same (.10).	0.50	1095.00	\$547.50
07/25/2022	JIS	AA	Review materials regarding restricted donation analysis.	0.30	1525.00	\$457.50
07/25/2022	MSP	AA	Review of donor restriction issue (.3); email exchange with James I. Stang, Iain Nasatir, et al. re: same (.10).	0.40	1095.00	\$438.00
				<b>1.20</b>		<b>\$1,443.00</b>
<b>Bankruptcy Litigation [L430]</b>						
07/17/2022	MSP	BL	Email exchange with Gillian N. Brown, Iain Nasatire re: motion for 2004 examinations of insurers.	0.10	1095.00	\$109.50
07/19/2022	GNB	BL	Telephone conference with Malhar S. Pagay and John W. Lucas regarding Rule 2004 practice relating to insurance.	1.00	925.00	\$925.00
07/19/2022	GNB	BL	Email Malhar S. Pagay regarding Rule 2004 discovery on insurers.	0.10	925.00	\$92.50
07/19/2022	GNB	BL	Email with Patricia J. Jeffries regarding Everlaw costs; Email with John W. Lucas and Patricia J. Jeffries regarding Everlaw issues.	0.10	925.00	\$92.50
07/19/2022	MSP	BL	Telephone conference with John W. Lucas and Gillian N. Brown re: discovery targets and strategy.	1.00	1095.00	\$1,095.00
07/19/2022	MSP	BL	Review case and other documents re: determining needed discovery.	2.00	1095.00	\$2,190.00
07/19/2022	MSP	BL	Continue review of case and other documents re: determining needed discovery.	1.80	1095.00	\$1,971.00
07/19/2022	MSP	BL	Work on preparation of 2004 examination motions re: insurers, et al (1.4).; email exchange with James I. Stang, John W. Lucas, Gillian N. Brown, Kerri L. LaBrada re: same (.20).	1.60	1095.00	\$1,752.00
07/19/2022	PJJ	BL	Review data site and email Gillian N. Brown regarding same.	0.30	495.00	\$148.50
07/19/2022	JWL	BL	Call with G. Brown and M. Pagay regarding discovery targets and outline of related issues (1.0):	1.00	1095.00	\$1,095.00
07/20/2022	GNB	BL	Review newly added document to Data Site.	0.10	925.00	\$92.50
07/20/2022	GNB	BL	E-mail with PSZJ team re Rule 2004 motions relating to insurance coverage.	0.10	925.00	\$92.50

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
54162 - 00004

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Invoice 130635  
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2022	MSP	BL	Email exchange with Gillian N. Brown, Patricia Jeffries, et al. re: document review.	0.10	1095.00	\$109.50
07/20/2022	MSP	BL	Email exchange with James I. Stang, John W. Lucas, Gillian N. Brown, Iain Nasatir, Kerri L. LaBrada re: Motions for 2004 examinations.	0.30	1095.00	\$328.50
07/20/2022	MSP	BL	Continue work on preparation of 2004 examination motions (2.7); email exchange with James I. Stang, Iain Nasatir, Kerri L. LaBrada, et al. re: same (.10).	2.80	1095.00	\$3,066.00
07/20/2022	MSP	BL	Work on litigation and potential document review matters, etc (1.4).; email exchange with James I. Stang, Gillian N. Brown, Patricia Jeffries et al. re: same (.10).	1.50	1095.00	\$1,642.50
07/20/2022	MSP	BL	Email with Iain Nasatir re: insurer rule 2004 motion.	0.10	1095.00	\$109.50
07/20/2022	KLL	BL	Prepare 2004 exam template.	1.10	495.00	\$544.50
07/21/2022	MSP	BL	Review documents re: identification of potential insurers.	1.90	1095.00	\$2,080.50
07/22/2022	MSP	BL	Email exchange with Gillian N. Brown, et al. re: document review status.	0.10	1095.00	\$109.50
07/22/2022	MSP	BL	Draft motion for rule 2004 examination of insurers.	2.40	1095.00	\$2,628.00
07/22/2022	MSP	BL	Work on case litigation matters, anticipated document review, etc. (.4); email exchange with Gillian N. Brown, et al. re: same (.10).	0.50	1095.00	\$547.50
07/23/2022	MSP	BL	Email exchange with Gillian N. Brown re: preparation of 2004 examination motions.	0.10	1095.00	\$109.50
07/23/2022	MSP	BL	Email exchange with Iain Nasatir, Gillian N. Brown et al. re: potential insurers.	0.60	1095.00	\$657.00
07/23/2022	MSP	BL	Finalize draft of motion for rule 2004 examination of insurers (.6); email exchange with Iain Nasatir, Kerri L. LaBrada, Gillian N. Brown re: same (.10).	1.70	1095.00	\$1,861.50
07/24/2022	GNB	BL	Email with Malhar S. Pagay regarding Rule 2004 motions relating to insurance.	1.00	925.00	\$925.00
07/25/2022	GNB	BL	Telephone conference with Miriam Levi regarding bates label production of documents from prepetition Data Site.	0.10	925.00	\$92.50
07/25/2022	GNB	BL	Telephone conference with Miriam Levi and John Hammel regarding data site; E-mail PSZJ and Paul Weiss counsel regarding same.	0.10	925.00	\$92.50
07/25/2022	MSP	BL	Email exchange with John A. Morris re: Rule 2004 motion practice.	0.10	1095.00	\$109.50



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/25/2022	MSP	BL	Email exchange with M. Levi, Gillian N. Brown re: Debtor's document data room.	0.10	1095.00	\$109.50
07/25/2022	MSP	BL	Work on additional potential rule 2004 motion targets (3.7); email exchange with James I. Stang, IN, Patricia Jeffries, Kerri L. LaBrada, et al. re: same (.10).	3.80	1095.00	\$4,161.00
07/25/2022	MSP	BL	Work on case litigation and mediation matters, document review (2.4); email exchange with Gillian N. Brown, J. Strauss, et al. re: same (.10).	2.50	1095.00	\$2,737.50
07/25/2022	PJJ	BL	Review data room regarding insurance documents.	6.50	495.00	\$3,217.50
07/26/2022	GNB	BL	Review email from Judge Chapman regarding mediation participant; Email Iain A.W. Nasatir and Malhar S. Pagay regarding Rule 2004 motion and service issue.	0.10	925.00	\$92.50
07/26/2022	MSP	BL	Email exchange with Iain Nasatir re: comments regarding motion for 2004 examination of insurers (.10); revise same.	1.00	1095.00	\$1,095.00
07/26/2022	MSP	BL	Email exchange with John A. Morris, Beth E. Levine re: 2004 motion practice.	0.10	1095.00	\$109.50
07/26/2022	MSP	BL	Email exchange with Iain Nasatir re: BGCA insurance.	0.10	1095.00	\$109.50
07/26/2022	MSP	BL	Email exchange with Gillian N. Brown re: review of insurance policies.	0.10	1095.00	\$109.50
07/26/2022	MSP	BL	Work on case litigation and document review issues (2.4); email exchange with Gillian N. Brown, Iain Nasatir, Patricia Jeffries, et al. re: same (.10).	2.50	1095.00	\$2,737.50
07/26/2022	PJJ	BL	Review/respond to email from Iain A. W. Nasatir regarding insurance correspondence.	0.20	495.00	\$99.00
07/27/2022	GNB	BL	Review email from state court counsel regarding insurance policies; mail Iain A.W. Nasatir and Malhar S. Pagay regarding same; Email Patricia J. Jeffries regarding same.	0.10	925.00	\$92.50
07/27/2022	GNB	BL	Email with Patricia J. Jeffries regarding Everlaw set up; Email with John Hammel Strauss regarding bates labeled documents from Data Site.	0.10	925.00	\$92.50
07/27/2022	GNB	BL	Email with PSZJ team regarding documents produced by Debtor (pre and post petition), and confidentiality and access thereto.	0.10	925.00	\$92.50
07/27/2022	MSP	BL	Email exchange with Gillian N. Brown re: potential rule 2004 examination targets.	0.10	1095.00	\$109.50
07/27/2022	MSP	BL	Email exchange with Iain Nasatir re: Rule 2004 motion re: insurers.	0.10	1095.00	\$109.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/27/2022	MSP	BL	Work on case litigation and document review matters; email exchange with Gillian N. Brown, J. Strauss, Patricia Jeffries, et al. re: same (.10).	2.80	1095.00	\$3,066.00
07/27/2022	PJJ	BL	Coordinate opening of Everlaw database.	0.30	495.00	\$148.50
07/27/2022	PJJ	BL	Research regarding umbrella policies (.2); download and circulate internally (.2).	0.40	495.00	\$198.00
07/27/2022	PJJ	BL	Import documents into Everlaw.	0.80	495.00	\$396.00
07/28/2022	GNB	BL	Set up document review parameters in Everlaw.	0.20	925.00	\$185.00
07/28/2022	GNB	BL	Email with Patricia J. Jeffries regarding import of Debtor's documents into Everlaw and load file issues.	0.20	925.00	\$185.00
07/28/2022	MSP	BL	Email exchange with James I. Stang re: Informal document request.	0.10	1095.00	\$109.50
07/28/2022	MSP	BL	Email exchange with Patricia Jeffries re: document availability.	0.10	1095.00	\$109.50
07/28/2022	MSP	BL	Draft motion for Rule 2004 examination of Boys and Girls Club of America	1.30	1095.00	\$1,423.50
07/28/2022	MSP	BL	Work on case litigation and document review matters (2.0); email exchange with Gillian N. Brown, Patricia Jeffries, M. Levi, et al. re: same (.10).	2.10	1095.00	\$2,299.50
07/28/2022	PJJ	BL	Address Everlaw upload issues.	1.00	495.00	\$495.00
07/28/2022	PJJ	BL	Telephone call with G. Brown re document production issues.	0.40	495.00	\$198.00
07/29/2022	GNB	BL	Telephone conference with Patricia H. Jeffries regarding issues with bares-labeled documents from Debtor and options to fix (from Denmark time zone).	0.40	925.00	\$370.00
07/29/2022	GNB	BL	Analyze Everlaw load file requirements and alternatives (.3); E-mail Miriam Levi and John Hammel Strauss regarding same (.1); E-mail Jay Horowitz at KL Discovery regarding same (.1) (from Denmark time zone).	0.50	925.00	\$462.50
07/29/2022	GNB	BL	Email with Deborah Spellman regarding Paul Weiss document production formatting and load files; E-mail Patricia J. Jeffries regarding same.	0.20	925.00	\$185.00
07/29/2022	MSP	BL	Email exchange with Iain Nasatir, John W. Lucas re: motion for rule 2004 examination of insurers.	0.10	1095.00	\$109.50
07/29/2022	MSP	BL	Email exchange with Gillian N. Brown, J. Strauss, Patricia Jeffries et al. re: discovery document format and process.	0.20	1095.00	\$219.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/30/2022	GNB	BL	Research Debtor real property asset.	0.10	925.00	\$92.50
07/30/2022	MSP	BL	Work on case litigation and document review matters; email exchange with Gillian N. Brown, et al. re: same (.10).	0.90	1095.00	\$985.50
07/31/2022	MSP	BL	Email exchange with John W. Lucas, Iain Nasatir, James I. Stang re: revisions to insurer rule 2004 motion (.10); revise same.	1.10	1095.00	\$1,204.50
07/31/2022	MSP	BL	Email exchange with Iain Nasatir re: draft of BGCA rule 2004 examination motion.	0.10	1095.00	\$109.50
				<u>54.50</u>		<u>\$52,295.50</u>

### Case Administration [B110]

07/18/2022	JWL	CA	Review revised suspension order and send questions to Paul Weiss regarding same (.5); prepare summary of revised suspension order for Committee and follow up questions with Debtor's counsel regarding the same (.5); further review of suspension order and prepare and send comments to Madison's counsel regarding same (.6);	1.60	1095.00	\$1,752.00
07/18/2022	LSC	CA	Prepare proposed pro hac vice order.	0.20	495.00	\$99.00
07/18/2022	KLL	CA	Prepare notice of appearance.	0.60	495.00	\$297.00
07/18/2022	KLL	CA	Update critical dates memo.	0.40	495.00	\$198.00
07/19/2022	GNB	CA	Direct staff regarding re-calendaring of critical dates.	0.10	925.00	\$92.50
07/19/2022	JIS	CA	Email J. Lucas regarding modifications to suspension motion.	0.10	1525.00	\$152.50
07/19/2022	JWL	CA	Review multiple drafts of proposed suspension order and provide comments and/or sign-off to Madison's counsel regarding same (.7);	0.70	1095.00	\$766.50
07/19/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
07/20/2022	JWL	CA	Review changes to suspension order and emails with parties regarding same (.5);	0.50	1095.00	\$547.50
07/28/2022	KLL	CA	Update critical dates memo.	0.20	495.00	\$99.00
				<u>4.70</u>		<u>\$4,152.50</u>

### Claims Admin/Objections[B310]

07/22/2022	JWL	CO	Review claims against acknowledged insurance policies (1.0);	1.00	1095.00	\$1,095.00
07/27/2022	MSP	CO	Email exchange with John W. Lucas, et al. re:	0.10	1095.00	\$109.50

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			Abuse Proof of Claim.			
07/27/2022	JWL	CO	Review and outline potential changes to abuse proof of claim form (2.0); outline changes to claim form for the Committee (.5);	2.50	1095.00	\$2,737.50
07/28/2022	JWL	CO	Call with G. Brown regarding the collection of abuse claim info (.2);	0.20	1095.00	\$219.00
07/29/2022	GNB	CO	Telephone conference with John W. Lucas regarding abuse claim detail.	0.20	925.00	\$185.00
07/30/2022	MSP	CO	Email exchange with John W. Lucas, B. Hart, et al. re: Abuse claim form.	0.10	1095.00	\$109.50
				<b>4.10</b>		<b>\$4,455.50</b>

**General Creditors Comm. [B150]**

07/16/2022	GNB	GC	Email with John W. Lucas regarding Committee Chair meeting tomorrow.	0.20	925.00	\$185.00
07/16/2022	GNB	GC	Prepare meeting outline for Committee	0.30	925.00	\$277.50
07/17/2022	GNB	GC	Prepare for meeting with Committee members.	0.30	925.00	\$277.50
07/17/2022	GNB	GC	Telephone conference with Committee Co-Chairs, James I. Stang, and John W. Lucas regarding start of representation.	1.00	925.00	\$925.00
07/17/2022	GNB	GC	Summarize notes from telephone conference with Committee Co-Chairs, James I. Stang, and John W. Lucas.	0.10	925.00	\$92.50
07/17/2022	GNB	GC	Prepare and edit materials for first Committee meeting.	0.50	925.00	\$462.50
07/17/2022	GNB	GC	Telephone conference with John W. Lucas re preparation for call with Committee members.	0.20	925.00	\$185.00
07/17/2022	JIS	GC	Call with J. Lucas regarding upcoming call with co-chairs and status of first day motions.	0.50	1525.00	\$762.50
07/17/2022	JIS	GC	Review and edit memo to Committee regarding first day motions.	0.40	1525.00	\$610.00
07/17/2022	JIS	GC	Email with J. Lucas re edits to first day memo.	0.10	1525.00	\$152.50
07/17/2022	JIS	GC	Call with committee co-chairs regarding case status and background.	1.00	1525.00	\$1,525.00
07/17/2022	JIS	GC	Telephone conference with Committee Co-Chairs, John W. Lucas, and Gillian N. Brown regarding beginning of Committee representation	1.00	1525.00	\$1,525.00
07/17/2022	JWL	GC	Call with J. Stang re meeting with co-chairs (.5); call with G. Brown regarding same (.2); call with committee chairs regarding organization and next	5.70	1095.00	\$6,241.50

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			steps (1.0); prepare memo for committee regarding July 20 hearing and second day motions (3.0); review proposed orders for second day hearing and provide comments to debtor's counsel (1.0);			
07/18/2022	GNB	GC	Prepare for Committee meeting today.	0.20	925.00	\$185.00
07/18/2022	GNB	GC	Review emails from Debtor's counsel and docket entries for the day.	0.10	925.00	\$92.50
07/18/2022	GNB	GC	Attend meeting with Committee members, state court counsel, James I. Stang, and John W. Lucas.	1.50	925.00	\$1,387.50
07/18/2022	GNB	GC	Revise notes of Committee meeting.	0.10	925.00	\$92.50
07/18/2022	GNB	GC	Review email from Committee member regarding Committee meeting today	0.30	925.00	\$277.50
07/18/2022	GNB	GC	Email with James I. Stang and John W. Lucas following Committee meeting.	0.10	925.00	\$92.50
07/18/2022	GNB	GC	Emails with Sophia Lee regarding filing issues.	0.20	925.00	\$185.00
07/18/2022	GNB	GC	Email with Kerri L. LaBrada regarding Committee and Counsel contacts.	0.20	925.00	\$185.00
07/18/2022	JIS	GC	Call with UST re case background and employment issues.	0.90	1525.00	\$1,372.50
07/18/2022	JIS	GC	Committee call re organization and first day motions.	1.50	1525.00	\$2,287.50
07/18/2022	JWL	GC	Prepare for committee meeting (.5) and participate in kick-off committee meeting with members and individual counsel, J. Stang and G. Brown (1.5); follow up email with J. Stang and G. Brown re meeting (.1);	2.10	1095.00	\$2,299.50
07/19/2022	GNB	GC	Email with Gini L. Downing regarding Committee and Counsel contacts.	0.10	925.00	\$92.50
07/19/2022	GNB	GC	Email with PSZJ lawyers and staff regarding work streams for case.	0.50	925.00	\$462.50
07/19/2022	GNB	GC	Email Miriam Levi and Daniel Finnegan regarding Data Site and bates labeling of documents in Data Site.	0.10	925.00	\$92.50
07/19/2022	JIS	GC	Review draft committee minutes and revise.	0.50	1525.00	\$762.50
07/19/2022	JIS	GC	Review/revise Committee common interest agreement.	0.50	1525.00	\$762.50
07/19/2022	JIS	GC	Review and revise Committee bylaws.	0.60	1525.00	\$915.00
07/19/2022	MSP	GC	Email exchange with James I. Stang, et al. re: Committee by-laws and common interest documents.	0.10	1095.00	\$109.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2022	MSP	GC	Attention to case administrative and background information (1.8); email exchange with James I. Stang, John W. Lucas, Gillian N. Brown, M. Levi, D. Finnegan, et al. re: same (.20).	2.00	1095.00	\$2,190.00
07/19/2022	JWL	GC	Draft and modify common interest agreement between committee and committee members' individual counsel (1.0);	1.00	1095.00	\$1,095.00
07/20/2022	GNB	GC	E-mail with John W. Lucas regarding deliverables for Committee.	0.10	925.00	\$92.50
07/20/2022	MSP	GC	Email exchange with John W. Lucas, Gillian N. Brown et al. re: Committee administrative matters,	0.10	1095.00	\$109.50
07/20/2022	MSP	GC	Attention to Committee administrative matters (.3); email exchange with James I. Stang, Gillian N. Brown, John W. Lucas, et al. re: same (.1).	0.40	1095.00	\$438.00
07/21/2022	JIS	GC	Draft update to committee on court hearing and pending matters.	0.50	1525.00	\$762.50
07/21/2022	JIS	GC	Call with J. Lucas regarding case strategy.	0.50	1525.00	\$762.50
07/21/2022	JIS	GC	Review bylaws and common interest agreement.	0.20	1525.00	\$305.00
07/21/2022	JIS	GC	Email J. Lucas re bylaws, common interest agreement and update memo.	0.10	1525.00	\$152.50
07/21/2022	MSP	GC	Attention to Committee administrative matters, hearing update; email exchange with James I. Stang, Gillian N. Brown, John W. Lucas, J. Amala, J. Freeman, et al. re: same.	0.50	1095.00	\$547.50
07/21/2022	JWL	GC	Review and revise committee bylaws in response to comments from state court counsel (1.0); review comments from state court counsel regarding common interest agreement, make changes, and send to J. Stang for review/comment (.5); call with J. Stang regarding case strategy (.5); prepare email to state court counsel regarding common interest, bylaws, financial advisors, and bar date (.5);	2.50	1095.00	\$2,737.50
07/21/2022	KLL	GC	Prepare Committee sharing protocol motion.	1.10	495.00	\$544.50
07/22/2022	JIS	GC	Call with J. Lucas for meeting agenda and mediation agenda.	0.50	1525.00	\$762.50
07/22/2022	MSP	GC	Telephone call with John W. Lucas re: case litigation and general status, mediation, etc.	0.50	1095.00	\$547.50
07/22/2022	MSP	GC	Attention to Committee administrative matters (.3); email exchange with John W. Lucas, et al. re: same (.10).	0.40	1095.00	\$438.00
07/22/2022	JWL	GC	Respond to committee chair questions regarding schedule (.2); call with J. Weber regarding pending	2.00	1095.00	\$2,190.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Madison motions including Paul Weiss, Teneo, Friedman and Pillsbury (.3); call with J. Stang regarding July 25 committee meeting agenda (.5); draft agenda for July 25 committee meeting (.5); call with M. Pagay re case status (.5)			
07/23/2022	JIS	GC	Email J. Lucas regarding case status/discovery.	0.10	1525.00	\$152.50
07/23/2022	MSP	GC	Email exchange with John W. Lucas et al. re: Committee meeting.	0.10	1095.00	\$109.50
07/23/2022	JWL	GC	Finalize agenda for July 25 committee meeting and send to members and counsel (.5);	0.50	1095.00	\$547.50
07/25/2022	JIS	GC	Email with J. Lucas regarding upcoming committee meeting, retention.	0.10	1525.00	\$152.50
07/25/2022	MSP	GC	Email exchange with James I. Stang, Iain Nasatir, et al. re: information for Committee meeting.	0.10	1095.00	\$109.50
07/25/2022	MSP	GC	Email exchange with John W. Lucas, M. Levi et al. re: Committee confidentiality issues.	0.10	1095.00	\$109.50
07/25/2022	MSP	GC	Telephone call with John W. Lucas re: case status and strategy.	0.20	1095.00	\$219.00
07/25/2022	JWL	GC	Review and revise committee info sharing motion (.8); prepare for weekly committee presentation (.5); attend weekly committee call with state court counsel and J. Stang (1.3); call with M. Pagay re case status (.2);	2.80	1095.00	\$3,066.00
07/26/2022	MSP	GC	Email with John W. Lucas re: case issues and strategy.	0.10	1095.00	\$109.50
07/26/2022	JWL	GC	Review final bylaws and arrange for committee member execution (.8);	0.80	1095.00	\$876.00
07/27/2022	GNB	GC	Email with James I. Stang regarding confidentiality.	0.10	925.00	\$92.50
07/27/2022	JIS	GC	Review issues related to confidentiality of Madison documents for official committee.	0.20	1525.00	\$305.00
07/27/2022	MSP	GC	Attention to Committee administrative matters; email exchange with John W. Lucas, Gillian N. Brown, Iain Nasatir, Patricia Jeffries, B. Hart, et al. re: same (.10).	0.50	1095.00	\$547.50
07/29/2022	GNB	GC	Email James I. Stang and John W. Lucas regarding issue for discussion with Committee (from Denmark time zone).	0.10	925.00	\$92.50
07/29/2022	JWL	GC	Call with A. Schwartz (UST) regarding case status (.8);	0.80	1095.00	\$876.00
07/31/2022	MSP	GC	Attention to Committee administration matters (.8); email exchange with John W. Lucas, J. Sapiro, et al. re: same (.10).	0.90	1095.00	\$985.50

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07/31/2022	JWL	GC	Call with G. Novod regarding case strategy (.2);	0.20	1095.00	\$219.00
				<b>41.00</b>		<b>\$47,120.00</b>

### Hearings

07/20/2022	JIS	H	Attend hearing regarding first day motions.	1.50	1525.00	\$2,287.50
07/20/2022	JWL	H	Attend July 20, 2022 hearing regarding second day motions/orders, stay motion, and mediation motion (1.5);	1.50	1095.00	\$1,642.50
				<b>3.00</b>		<b>\$3,930.00</b>

### Insurance Coverage

07/17/2022	GNB	IC	Email with Iain A.W. Nasatir regarding Rule 2004 motions relating to insurance.	0.30	925.00	\$277.50
07/17/2022	GNB	IC	Email internal PSZJ team regarding insurance-related documents analyses and Rule 2004 discovery.	0.30	925.00	\$277.50
07/18/2022	GNB	IC	Coordinate with staff for transfer of insurance documents to Iain A.W. Nasatir.	0.10	925.00	\$92.50
07/18/2022	MAM	IC	Review policies for Gillian N. Brown and compare to policies in the Virtual File Room.	0.50	460.00	\$230.00
07/18/2022	MAM	IC	Review and forward insurance documents to .Iain Nasatir.	0.40	460.00	\$184.00
07/22/2022	JWL	IC	Review Jefferson Ins. Co. coverage letter and email to PSZJ team regarding the same (.7); call with L. Klein regarding Federal insurance (.2);	0.90	1095.00	\$985.50
07/24/2022	MSP	IC	Email exchange with Gillian N. Brown, et al. re: insurance coverage information.	0.10	1095.00	\$109.50
				<b>2.60</b>		<b>\$2,156.50</b>

### Mediation

07/19/2022	GNB	ME	Review emails among parties in interest regarding mediation availability.	0.10	925.00	\$92.50
07/20/2022	JIS	ME	Call with G. Galardi regarding Rockefeller role in mediation.	0.20	1525.00	\$305.00
07/20/2022	JWL	ME	Coordinate scheduling of initial mediation session with committee and state court counsel (.5);	0.50	1095.00	\$547.50
07/21/2022	JWL	ME	Review and respond to mediation scheduling email from M. Levi (.3);	0.30	1095.00	\$328.50
07/22/2022	JIS	ME	Call with Lucas, Pagay regarding upcoming	1.00	1525.00	\$1,525.00



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			mediation.			
07/22/2022	MSP	ME	Email exchange with John W. Lucas, Iain Nasatir, et al. re: preparation for mediation.	0.10	1095.00	\$109.50
07/22/2022	MSP	ME	Email exchange with John W. Lucas, S. Gershowitz, J. Freeman, L. Leder, et al. re: preparation for mediation session, insurance issues, etc.	0.80	1095.00	\$876.00
07/22/2022	MSP	ME	Meeting with James I. Stang and John W. Lucas re: preparation for initial mediation meeting.	1.00	1095.00	\$1,095.00
07/22/2022	JWL	ME	Call with J. Stang, M. Pagay regarding preparations for July 25 mediation (1.0);	1.00	1095.00	\$1,095.00
07/25/2022	GNB	ME	Review email from Miriam Levi reading state court counsel contact information for Judge Chapman: Email with James I. Stang regarding same.	0.10	925.00	\$92.50
07/25/2022	JIS	ME	(Partial) attend mediation.	0.90	1525.00	\$1,372.50
07/25/2022	MSP	ME	Initial meeting with Mediation Parties and Mediator.	1.00	1095.00	\$1,095.00
07/25/2022	JWL	ME	Attend kick-off mediation session with all mediation parties (1.0);	1.00	1095.00	\$1,095.00
07/26/2022	MSP	ME	Email exchange with J. Eisen re: mediation list.	0.10	1095.00	\$109.50
07/27/2022	MSP	ME	Email exchange with John W. Lucas, et al. re: mediation session.	0.10	1095.00	\$109.50
07/28/2022	MSP	ME	Email exchange with James I. Stang, et al. re: mediation statement.	0.10	1095.00	\$109.50
07/28/2022	JWL	ME	Prepare outline for Aug. 3 mediation statement (1.5); research regarding Aug. 3 Mediation Statement (2.7); draft Aug. 3 mediation statement (1.5);	5.70	1095.00	\$6,241.50
07/29/2022	JWL	ME	Research and draft Aug. 3 mediation statement (2.5); attend call with state court counsel regarding Aug. 3 mediation statement (1.0); continued research and drafting of Aug. 3 mediation statement (2.2);	5.70	1095.00	\$6,241.50
07/30/2022	JWL	ME	Research and draft Aug. 3 mediation statement (2.0);	2.00	1095.00	\$2,190.00
07/31/2022	JIS	ME	Review/revise mediation statement.	0.70	1525.00	\$1,067.50
07/31/2022	MSP	ME	Email exchange with John W. Lucas, J. Amala, et al. re: Mediation statement.	0.10	1095.00	\$109.50
07/31/2022	JWL	ME	Revise Aug. 3 mediation statement and send out for review and comments (1.0);	1.00	1095.00	\$1,095.00
				<b>23.50</b>		<b>\$26,902.50</b>

**Retention of Prof. [B160]**

07/16/2022	GNB	RP	Email La Asia S. Canty, Kerri L. LaBrada and	0.10	925.00	\$92.50
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Sophia Lee regarding pro hac vice papers.			
07/16/2022	GNB	RP	Email with John W. Lucas regarding PSZJ employment application.	0.10	925.00	\$92.50
07/16/2022	GNB	RP	Prepare motion to employ PSZJ and associated papers.	0.50	925.00	\$462.50
07/17/2022	GNB	RP	Prepare motion to employ PSZJ and associated papers.	0.20	925.00	\$185.00
07/18/2022	GNB	RP	Email with staff regarding ad hoc admission for James I. Stang; Email with Gini L. Downing regarding motion to employ PSZJ documents.	0.10	925.00	\$92.50
07/18/2022	GNB	RP	Revise and edit motion to admit James I. Stang pro hac vice and order thereon.	0.20	925.00	\$185.00
07/18/2022	JIS	RP	Call with J. Lucas regarding employment application issues.	0.20	1525.00	\$305.00
07/18/2022	JWL	RP	Research regarding scope of representation issues (.4); call with J. Stang re same (.2)	0.60	1095.00	\$657.00
07/20/2022	GNB	RP	Draft application to employ PSZJ and associated papers.	1.40	925.00	\$1,295.00
07/25/2022	GNB	RP	Email with John W. Lucas regarding prepetition billing.	0.10	925.00	\$92.50
07/25/2022	JIS	RP	Review employment application.	0.50	1525.00	\$762.50
07/25/2022	JWL	RP	Review and revise PSZJ retention application and declaration (2.0);	2.00	1095.00	\$2,190.00
07/26/2022	JWL	RP	Review and revise declaration in support of PSZJ retention application (.9);	0.90	1095.00	\$985.50
07/30/2022	MSP	RP	Email exchange with John W. Lucas, Gillian N. Brown re: PSZJ retention application.	0.10	1095.00	\$109.50
				<u>7.00</u>		<u>\$7,507.00</u>

**Ret. of Prof./Other**

07/18/2022	JWL	RPO	Review Debtor's retention applications and send summary to J. Stang (.7);	0.70	1095.00	\$766.50
07/20/2022	JIS	RPO	Call J. Lucas re Debtor employment applications.	0.20	1525.00	\$305.00
07/20/2022	JWL	RPO	Telephone call with J. Stang regarding Debtor's employment application.	0.40	1095.00	\$438.00
07/21/2022	JIS	RPO	Call J. Lucas regarding upcoming objection deadlines and response to Debtor.	0.20	1525.00	\$305.00
07/21/2022	JWL	RPO	Call with M. Levi regarding Friedman retention application (.2); email to the committee regarding	2.50	1095.00	\$2,737.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			the same (.3); prepare and send summary of retention applications of Madison to Committee (1.6); call with J. Stang re Debtor retention applications (.4)			
07/25/2022	JWL	RPO	Prepare summary of issue for Madison regarding Friedman Kaplan retention (.6);	0.60	1095.00	\$657.00
07/26/2022	JWL	RPO	Call with Madison's counsel regarding Friedman Kaplan retention (.5); review Friedman Kaplan original engagement letters (.4); call with M. Levi regarding same (.2);	1.10	1095.00	\$1,204.50
07/27/2022	GNB	RPO	Email James I. Stang and John W. Lucas regarding potential financial advisor issues; E-mail with Miriam Levi regarding same.	0.10	925.00	\$92.50
07/27/2022	JWL	RPO	Call with J. Weber regarding Friedman retention (.1); email to Committee regarding potential resolution (.5); numerous follow up emails with Committee regarding Friedman Kaplan resolution (.7);	1.30	1095.00	\$1,423.50
07/28/2022	MSP	RPO	Email exchange with John W. Lucas, et al. re: Friedman Kaplan retention.	0.10	1095.00	\$109.50
07/29/2022	JWL	RPO	Review revised Friedman Kaplan retention order and follow up email to M. Levi (.2);	0.20	1095.00	\$219.00
				<b>7.40</b>		<b>\$8,258.00</b>
<b>Stay Litigation [B140]</b>						
07/19/2022	JIS	SL	Call with J. Lucas regarding Second Circuit decision regarding automatic stay.	0.30	1525.00	\$457.50
07/19/2022	JWL	SL	Research regarding effect of stay against non-debtor parties to a prepetition action against a debtor (.7); call with J. Stang re same (.3)	1.00	1095.00	\$1,095.00
				<b>1.30</b>		<b>\$1,552.50</b>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$159,773.00</b>

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**Expenses**

07/19/2022	FF	Filing Fee [E112] USBC Southern District of New York, Pro Hac Vice Fee (JIS), GNB	200.00
07/31/2022	LN	54162.00004 Lexis Charges for 07-31-22	10.54
07/31/2022	OS	Everlaw, Inv. 61847, prorate for 5/31 days in the Madison database for the month of July	80.65
<b>Total Expenses for this Matter</b>			<b>\$291.19</b>

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**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 07/31/2022**

<b>Total Fees</b>	<b>\$159,773.00</b>
<b>Total Expenses</b>	<b>291.19</b>
<b>Less Courtesy Discount</b>	<b>\$31,853.00</b>
<b>Total Due on Current Invoice</b>	<b>\$128,211.19</b>

**Outstanding Balance from prior invoices as of 07/31/2022 (May not include recent payments)**

<b><u>A/R Bill Number</u></b>	<b><u>Invoice Date</u></b>	<b><u>Fees Billed</u></b>	<b><u>Expenses Billed</u></b>	<b><u>Balance Due</u></b>
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<b>Total Amount Due on Current and Prior Invoices:</b>	<b>\$128,211.19</b>
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**Objection Deadline: October 5, 2022**

James I. Stang (admitted *pro hac vice*)  
John W. Lucas  
Malhar S. Pagay (admitted *pro hac vice*)  
Gillian N. Brown  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34th Floor  
New York, NY 10017-2024  
Telephone: 212.561.7700  
Fax: 212.561.7777  
Emails: jstang@pszjlaw.com  
jlucas@pszjlaw.com  
mpagay@pszjlaw.com  
gbrown@pszjlaw.com

*Counsel to the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X
	:
In re	: Chapter 11
	:
MADISON SQUARE BOYS & GIRLS CLUB, INC., <sup>1</sup>	: Case No. 22-10910-SHL
	:
Debtor.	:
	:
-----	X

**SECOND MONTHLY FEE STATEMENT OF  
PACHULSKI STANG ZIEHL & JONES LLP FOR  
COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR THE PERIOD FROM AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

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<sup>1</sup>The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional:	Official Committee of Unsecured Creditors
Services to:	Official Committee of Unsecured Creditors
Date of Retention:	July 16, 2022
Period for which compensation and reimbursement is sought:	August 1, 2022 through August 31, 2022
Monthly Fees Incurred	\$254,095.50
Fee Reduction	(\$55,335.50) <sup>2</sup>
Fees (After Reduction)	\$198,760.00
20% Holdback:	\$39,830.80
Total Fees Less 20% Holdback:	\$159,008.00
Monthly Expenses Incurred:	\$4,027.47
Total Fees and Expenses Due:	\$163,035.47

This is a   X   monthly       interim       final application

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), the *Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to*

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<sup>2</sup> As disclosed in the Firm’s employment application, the Firm is utilizing rates that are reduced from standard rates so that attorney time is capped at \$900 per hour and paralegal time is capped at \$400 per hour. The reduction set forth in this Fee Statement accounts for the reduction from the following standard rates, as set forth in Exhibit A hereto: J. Stang (\$1,525); I. Nasatir (\$1,295); M. Pagay (\$1,095); J. Lucas (\$1,095); B. Levine (\$1,045); G. Brandt (\$995); G. Brown (\$925); B. Dassa (\$495); P. Jeffries (\$495); L. Canty (\$495); K. LaBrada (\$495); and M. Matteo (\$460).

*the Official Committee of Unsecured Creditors Effective as of July 16, 2022* [Docket No. 196] (the “PSZJ Retention Order”), and the *Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [Docket No. 125] (the “Interim Compensation Order”),<sup>3</sup> Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors (the “Committee”), hereby submits this second monthly fee statement (the “Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Committee in this chapter 11 case (the “Case”) during the period August 1, 2022 to August 31, 2022 (the “Fee Period”).

By this Fee Statement, PSZJ seeks payment in the amount of \$163,035.47, comprised of the following: (i) \$159,008.00, which is eighty percent (80%) of the total amount of fees incurred for actual and necessary services rendered during the Fee Period, and (ii) reimbursement of \$4,027.47, which is one hundred percent (100%) of actual and necessary expenses that PSZJ incurred in connection with its representation of the Committee during the Fee Period.

### **Services Rendered and Expenses Incurred**

1. Attached as **Exhibit A** is a summary of PSZJ’s professionals by individual, setting forth the (i) name and title of each individual who provided services in connection with this chapter 11 case during the Fee Period, (ii) the year of bar admission for each PSZJ attorney, (iii) current, standard hourly billing rate for each individual at PSZJ working on this chapter 11 case during the Fee Period, (iv) the capped hourly rate for those individuals, and (v) the total fees that each individual billed to this Case during the Fee Period at the applicable capped billing rate. The Committee hired PSZJ on the condition that the total fees incurred would be discounted

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<sup>3</sup> Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.



to the extent the blended rate of PSZJ attorneys does not exceed \$900.00 per hour. As provided in the PSZJ Retention Order, PSZJ paralegals on this Case do not exceed \$400.00 per hour. All of the PSZJ paralegals who worked on this Case during the Fee Period have standard billing rates in excess of \$400.00 per hour. PSZJ is providing a reduction in fees for the Fee Period in the amount of \$55,335.50.

2. Attached as **Exhibit B** is a summary of the services PSZJ rendered during the Fee Period and the compensation it seeks, by project category.

3. Attached as **Exhibit C** is a summary of expenses that PSZJ incurred during the Fee Period and for which it seeks reimbursement.

4. Attached as **Exhibit D** is an itemized time detail of PSZJ professionals during the Fee Period and summary materials related thereto.

#### **Notice and Objection Procedures**

5. Notice of this Fee Statement shall be given by hand or overnight delivery, or by email where available, upon (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Tim McChristian); (b) Debtor's counsel: Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Andrew M. Parlen, John T. Weber); and (c) William K. Harrington, United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz and Tara Tiantian) (together with PSZJ, at the mailing or email addresses set forth on the caption page of this Fee Statement, the "Notice Parties").

6. Objections to this Fee Statement, if any, must be filed with the Court and served upon PSZJ and the other Notice Parties (set forth at para. 5, above) so as to be received no later

than **fifteen (15) calendar days after filing of the Fee Statement** (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

7. If no Objections to this Fee Statement are filed and served as set forth above, the Debtor shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses set forth in this Fee Statement.

8. If an Objection to this Fee Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. *See* Docket No. 125. To the extent such an Objection is not resolved between PSZJ and the party filing the Objection, the Objection shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: September 20, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Gillian N. Brown

James I. Stang (admitted *pro hac vice*)

John W. Lucas

Malhar S. Pagay (admitted *pro hac vice*)

Gillian N. Brown

780 Third Avenue, 34th Floor

New York, NY 10017-2024

Telephone: 212.561.7700

Fax: 212.561.7777

Emails: jstang@pszjlaw.com

jlucas@pszjlaw.com

mpagay@pszjlaw.com

gbrown@pszjlaw.com

*Counsel to the Official Committee of Unsecured  
Creditors*

**EXHIBIT A**

**Compensation by Professional**

**SUMMARY OF COMPENSATION BY PROFESSIONAL  
FOR SERVICES RENDERED FOR THE PERIOD  
AUGUST 1, 2022- AUGUST 31, 2022**

<b>Name of Professional Partners and Counsel</b>	<b>Title</b>	<b>Year Admitted</b>	<b>Standard Hourly Rate (\$)</b>	<b>Capped Hourly Rate in this Case (\$)</b>	<b>Total Billed Hours</b>	<b>Total Compensation at Capped Rate (\$)</b>
James I. Stang	Partner	1980	1,525.00	900.00	16.40	14,760.00
Iain A. W. Nasatir	Partner	1990	1,295.00	900.00	49.50	44,550.00
Malhar S. Pagay	Partner	1997	1,095.00	900.00	73.30	65,970.00
John W. Lucas	Partner	2005	1,095.00	900.00	39.90	35,910.00
Gina F. Brandt	Counsel	1976	995.00	900.00	1.20	1,080.00
Beth E. Levine	Counsel	1993	1,045.00	900.00	1.80	1,620.00
Gillian N. Brown	Counsel	1999	925.00	900.00	27.50	24,750.00
<b>Total Partners and Counsel:</b>					<b>209.60</b>	<b>188,640.00</b>

<b>Name of Paralegals and Other Non-Legal Staff</b>	<b>Standard Hourly Billing Rate (\$)</b>	<b>Capped Hourly Rate in this Case (\$)</b>	<b>Total Billed Hours</b>	<b>Total Compensation at Capped Rate (\$)</b>
Patricia J. Jeffries	495.00	400.00	6.60	2,640.00
Beth D. Dassa	495.00	400.00	0.20	80.00
Kerri L. LaBrada	495.00	400.00	17.10	6,840.00
La Asia S. Canty	495.00	400.00	1.20	480.00
Michael A. Matteo	460.00	400.00	0.20	80.00
<b>Total Paralegals and Other Non-Legal Staff:</b>			<b>25.30</b>	<b>10,120.00</b>

<b>ALL PROFESSIONALS</b>	<b>DISCOUNTED/CAPPED BLENDED RATE (\$)</b>	<b>TOTAL BILLED HOURS</b>	<b>TOTAL COMPENSATION (\$)</b>
Partners and Counsel		209.60	188,640.00
Paralegals/Non-Legal Staff		25.30	10,120.00
<b>Total Hours and Fees Incurred</b>		<b>234.90</b>	<b>198,760.00</b>

**EXHIBIT B**

**Compensation by Task Code**

**AGGREGATE TIME SUMMARY BY TASK CODE  
FOR THE PERIOD AUGUST 1, 2022- AUGUST 31, 2022**

<b>Task Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
AA	Asset Analysis and Recovery	0.40	\$610.00
BL	Bankruptcy Litigation	149.70	\$158,346.50
CA	Case Administration	6.90	\$4,779.50
CO	Claims Admin/Objections	11.70	\$12,811.50
FN	Financing	0.40	\$490.00
GC	General Creditors' Committee	29.10	\$34,564.50
MC	Meeting of Creditors	9.80	\$12,709.00
ME	Mediation	16.80	\$20,179.00
RP	Retention of Professionals	6.60	\$5,884.00
RPO	Retention of Professionals/Others	3.20	\$3,264.00
SL	Stay Litigation	0.30	\$457.50
	<b>TOTAL</b>	234.90	<b>\$254,095.50, less discount, for total of \$198,760.00</b>

**EXHIBIT C**

**Expense Summary**

**AGGREGATE ITEMIZED EXPENSES FOR THE PERIOD  
AUGUST 1, 2022- AUGUST 31, 2022**

<b>Expenses Category</b>	<b>Total Expenses</b>
Federal Express	\$1,828.10
Filing Fee	\$200.00
Fax Transmittal	\$35.00
Lexis/Nexis Legal Research	\$138.97
Outside Services	\$500.00
Postage	\$211.00
Reproduction Expense	\$503.30
Reproduction/Scan Copy	\$175.10
Transcript	\$436.00
<b>TOTAL</b>	<b>\$4,027.47</b>



**EXHIBIT D**

**Itemized Time Detail for the Fee Period**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

August 31, 2022

Invoice 130861

Client 54162

Matter 00004

**GNB**

GNB

RE: Committee Representaton

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 08/31/2022**

FEES	\$254,095.50
EXPENSES	\$4,027.47
LESS COURTESY DISCOUNT	\$55,335.50
<b>TOTAL CURRENT CHARGES</b>	<b>\$202,787.47</b>
<b>BALANCE FORWARD</b>	<b>\$128,211.19</b>
<b>TOTAL BALANCE DUE</b>	<b>\$330,998.66</b>

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BDD	Dassa, Beth D.	Paralegal	495.00	0.20	\$99.00
BEL	Levine, Beth E.	Counsel	1045.00	1.80	\$1,881.00
GFB	Brandt, Gina F.	Counsel	995.00	1.20	\$1,194.00
GNB	Brown, Gillian N.	Counsel	925.00	27.50	\$25,437.50
IAWN	Nasatir, Iain A. W.	Partner	1295.00	49.50	\$64,102.50
JIS	Stang, James I.	Partner	1525.00	16.40	\$25,010.00
JWL	Lucas, John W.	Partner	1095.00	39.90	\$43,690.50
KLL	LaBrada, Kerri L.	Paralegal	495.00	17.10	\$8,464.50
LSC	Canty, La Asia S.	Paralegal	495.00	1.20	\$594.00
MAM	Matteo, Mike A.	Paralegal	460.00	0.20	\$92.00
MSP	Pagay, Malhar S.	Partner	1095.00	73.30	\$80,263.50
PJJ	Jeffries, Patricia J.	Paralegal	495.00	6.60	\$3,267.00
				234.90	\$254,095.50

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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.40	\$610.00
BL	Bankruptcy Litigation [L430]	149.70	\$158,346.50
CA	Case Administration [B110]	6.90	\$4,779.50
CO	Claims Admin/Objections[B310]	11.70	\$12,811.50
FN	Financing [B230]	0.40	\$490.00
GC	General Creditors Comm. [B150]	29.10	\$34,564.50
MC	Meeting of Creditors [B150]	9.80	\$12,709.00
ME	Mediation	16.80	\$20,179.00
RP	Retention of Prof. [B160]	6.60	\$5,884.00
RPO	Ret. of Prof./Other	3.20	\$3,264.00
SL	Stay Litigation [B140]	0.30	\$457.50
		234.90	<hr/> \$254,095.50

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**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Federal Express [E108]	\$1,828.10
Filing Fee [E112]	\$200.00
Fax Transmittal [E104]	\$35.00
Lexis/Nexis- Legal Research [E	\$138.97
Outside Services	\$500.00
Postage [E108]	\$211.00
Reproduction Expense [E101]	\$503.30
Reproduction/ Scan Copy	\$175.10
Transcript [E116]	\$436.00
	<hr/>
	\$4,027.47

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<b>Asset Analysis/Recovery[B120]</b>						
08/26/2022	JIS	AA	Call with J. Lucas and Dundon regarding FA tasks.	0.40	1525.00	\$610.00
				<b>0.40</b>		<b>\$610.00</b>
<b>Bankruptcy Litigation [L430]</b>						
07/19/2022	IAWN	BL	Review Gillian N. Brown emails regarding contacts, Committee and data room	0.80	1295.00	\$1,036.00
08/01/2022	IAWN	BL	Review comments on 2004 discovery	0.30	1295.00	\$388.50
08/01/2022	JIS	BL	Review BGCA Rule 2004 motion.	0.30	1525.00	\$457.50
08/01/2022	MSP	BL	Work on 2004 examinations issues	1.40	1095.00	\$1,533.00
08/01/2022	MSP	BL	Email exchange with James I. Stang re: comments on 2004 examination motion re: BGCA.	0.10	1095.00	\$109.50
08/01/2022	PJJ	BL	Conference call with Everlaw and Debtor's counsel regarding load files (.3); including pre-call with Everlaw (.2)	0.50	495.00	\$247.50
08/02/2022	MSP	BL	Work on rule 2004 motion issues and revise BGCA rule 2004 examination motion per James I. Stang comments (1.8); email exchange with James I. Stang, John W. Lucas and Iain Nasatir re: same (.10).	1.90	1095.00	\$2,080.50
08/02/2022	MSP	BL	Email exchange with John W. Lucas re: Insurer rule 2004 motion.	0.10	1095.00	\$109.50
08/03/2022	MSP	BL	Email exchange with John W. Lucas re: Rule 2004 motions.	0.10	1095.00	\$109.50
08/04/2022	GNB	BL	Research chambers rules and local rules pertaining to Rule 2004 motions.	0.10	925.00	\$92.50
08/04/2022	IAWN	BL	Review emails from Malhar S. Pagay and John Lucas regarding timing of 2004	0.20	1295.00	\$259.00
08/04/2022	JIS	BL	Review Rule 2004 exams for insurance companies and BGCA.	0.50	1525.00	\$762.50
08/04/2022	MSP	BL	Work on rule 2004 motion issues (2.3); Email exchange with James I. Stang, John W. Lucas, Iain Nasatir, Beth E. Levine re: same (.20); telephone call with Beth E. Levine re same (.3).	2.80	1095.00	\$3,066.00
08/04/2022	BEL	BL	Telephone conference with Malhar S. Pagay regarding Rule 2004 motion.	0.30	1045.00	\$313.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/04/2022	BEL	BL	Review issues regarding 2004 motion.	0.60	1045.00	\$627.00
08/04/2022	JWL	BL	Outline for state court counsel and committee 2004 motions, process, and comments to the same.	0.60	1095.00	\$657.00
08/05/2022	GNB	BL	E-mail PSZJ team regarding Rule 2004 issues relating to insurance.	0.20	925.00	\$185.00
08/05/2022	GNB	BL	Email Patricia J. Jeffries regarding Paul Weiss load file for document production; Email with Iain A.W. Nasatir regarding insurance documents.	0.10	925.00	\$92.50
08/05/2022	IAWN	BL	Review Malhar S. Pagay and James I. Stang emails regarding 2004 timing	0.10	1295.00	\$129.50
08/05/2022	IAWN	BL	Exchange emails with James I. Stang, Malhar S. Pagay, John Lucas regarding insurance possibilities and timing	0.20	1295.00	\$259.00
08/05/2022	IAWN	BL	Exchange emails with Gillian N. Brown regarding insurance documents	0.10	1295.00	\$129.50
08/05/2022	MSP	BL	Telephone calls (2) with Beth E. Levine re: Rule 2004 motions.	0.30	1095.00	\$328.50
08/05/2022	MSP	BL	Email John W. Lucas re: 2004 motions, etc.	0.40	1095.00	\$438.00
08/05/2022	MSP	BL	Work on Rule 2004 motions and discovery issues (2.2); email exchange with Beth E. Levine, John W. Lucas, Iain Nasatir, James I. Stang, et al. re: same (.20).	2.40	1095.00	\$2,628.00
08/05/2022	BEL	BL	Correspondence with Chambers regarding scheduling of motion.	0.20	1045.00	\$209.00
08/05/2022	BEL	BL	Telephone conferences with Malhar S. Pagay regarding 2004 motion.	0.20	1045.00	\$209.00
08/05/2022	BEL	BL	Email with La Asia Canty regarding 2004 motion.	0.20	1045.00	\$209.00
08/05/2022	LSC	BL	Research and correspondence with B. Levine and M. Pagay re 2004 motion.	0.30	495.00	\$148.50
08/06/2022	MSP	BL	Continue work on discovery matters.	2.20	1095.00	\$2,409.00
08/06/2022	MSP	BL	Work on rule 2004 motion issues and other discovery matters, including motions to shorten notice.	2.90	1095.00	\$3,175.50
08/07/2022	MSP	BL	Attention to discovery matters, including document requests.	2.30	1095.00	\$2,518.50
08/07/2022	MSP	BL	Work on rule 2004 motion issues (2.4); email	2.50	1095.00	\$2,737.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			exchange with James I. Stang, et al. re: same (.10).			
08/08/2022	IAWN	BL	Review Patricia Jeffries emails regarding service of 2004	0.10	1295.00	\$129.50
08/08/2022	JIS	BL	Review Rule 2004 motions.	0.20	1525.00	\$305.00
08/08/2022	MSP	BL	Work on rule 2004 motion issues, including obtaining hearings on shortened notice (2.7); email exchange with John W. Lucas, L. Ebanks, James I. Stang, M. Levi, Patricia Jeffries, Kelly L. LaBrada, et al. re: same (.10).	2.80	1095.00	\$3,066.00
08/08/2022	MSP	BL	Telephone calls (2) with John W. Lucas re: Rule 2004 motions.	0.20	1095.00	\$219.00
08/08/2022	MSP	BL	Email with James I. Stang re: Rule 2004 motions.	0.10	1095.00	\$109.50
08/08/2022	MSP	BL	Attention to discovery matters (1.9); email exchange with LaAsia Canty, et al. re: same (.10).	2.00	1095.00	\$2,190.00
08/08/2022	PJJ	BL	Review/revise insurance chart.	2.50	495.00	\$1,237.50
08/09/2022	GNB	BL	Email with John W. Lucas regarding Debtor's document production; Review emails from PSZJ to Committee regarding variety of issues to be handled.	0.10	925.00	\$92.50
08/09/2022	GNB	BL	E-mail Malhar S. Pagay regarding Rule 2004 motions re insurance. E-mail Patricia J. Jeffries regarding same.	0.10	925.00	\$92.50
08/09/2022	GNB	BL	Review motion re confidential information.	0.10	925.00	\$92.50
08/09/2022	IAWN	BL	Email PSZJ team regarding telephone call with debtor regarding insurance	0.10	1295.00	\$129.50
08/09/2022	IAWN	BL	Exchange emails with team regarding state court subpoenas	0.10	1295.00	\$129.50
08/09/2022	IAWN	BL	Review Gillian N. Brown, Malhar S. Pagay emails regarding timing of 2004	0.20	1295.00	\$259.00
08/09/2022	MSP	BL	Work on rule 2004 motion issues (4.2); email exchange with Patricia Jeffries, Iain Nasatir, Gillian N. Brown, John W. Lucas, et al. re: same (.40).	4.60	1095.00	\$5,037.00
08/09/2022	MSP	BL	Email John W. Lucas re: Rule 2004 motions.	0.10	1095.00	\$109.50
08/09/2022	MSP	BL	Telephone calls with Patricia Jeffries re: Rule 2004 motion re: insurers.	0.20	1095.00	\$219.00
08/09/2022	PJJ	BL	Telephone conference with Malhar S. Pagay (2x) regarding 2004 motions.	0.50	495.00	\$247.50



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08/09/2022	PJJ	BL	Prepare 2004 motions and order shortening time for filing and service.	2.80	495.00	\$1,386.00
08/10/2022	GNB	BL	Email Patricia J. Jeffries regarding new production of insurance-related documents from Debtor; E-mail Kerri L. LaBrada regarding uploads to Everlaw; E-mail Miriam Levi regarding Kerri L. LaBrada access to Debtor's data site.	0.10	925.00	\$92.50
08/10/2022	IAWN	BL	Exchange emails with Malhar S. Pagay regarding court hearing coverage	0.10	1295.00	\$129.50
08/10/2022	MSP	BL	Attention to status of pending orders (2.2); email exchange with Kelly L. LaBrada, LaAsia Canty, Patricia Jeffries, et al. re: same (.20).	2.40	1095.00	\$2,628.00
08/10/2022	MSP	BL	Attention to potential hearing dates for Rule 2004 motions (.3); email exchange with Iain Nasatir, L. Ebanks, et al. re: same (.10).	0.40	1095.00	\$438.00
08/10/2022	MSP	BL	Email exchange with Committee members and state court counsel re: filing of Rule 2004 motions.	0.20	1095.00	\$219.00
08/10/2022	MSP	BL	Emails with John W. Lucas re: Rule 2004 motions, upcoming hearing.	0.50	1095.00	\$547.50
08/10/2022	PJJ	BL	Process additional productions.	0.30	495.00	\$148.50
08/10/2022	LSC	BL	Research and correspondence with attorneys regarding issues with respect to pending motions and submission of proposed orders.	0.50	495.00	\$247.50
08/10/2022	KLL	BL	Review datasite sharefiles.	0.40	495.00	\$198.00
08/11/2022	MSP	BL	Email exchange with Kelly L. LaBrada re: submission of outstanding orders.	0.10	1095.00	\$109.50
08/11/2022	KLL	BL	Email judge's chambers with copy of proposed order re Motion to Shorten Time on BGCA 2004 Motion.	0.40	495.00	\$198.00
08/11/2022	KLL	BL	Email judge's chambers with copy of proposed order re Motion to Shorten Time on Certain Insurers 2004 motion.	0.10	495.00	\$49.50
08/12/2022	KLL	BL	Correspond with chambers case manager for hearing date.	0.20	495.00	\$99.00
08/13/2022	IAWN	BL	Exchange emails with Malhar S. Pagay re negotiating 2004 compromise with insurers	0.20	1295.00	\$259.00
08/13/2022	MSP	BL	Email exchange with Iain Nasatir, Gillian N. Brown, Kelly L. LaBrada, et al. re: Rule 2004 motions hearings.	0.70	1095.00	\$766.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/14/2022	GNB	BL	E-mail with Iain A.W. Nasatir and Malhar S. Pagay regarding strategy for negotiation on insurance-related Rule 2004 motions for document production (Norway time zone).	0.10	925.00	\$92.50
08/14/2022	IAWN	BL	Revise Malhar S. Pagay email to National	0.10	1295.00	\$129.50
08/14/2022	IAWN	BL	Exchange emails regarding National	0.10	1295.00	\$129.50
08/14/2022	MSP	BL	Work on meet and confer re: BGCA Rule 2004 motion and draft letter re: same (2.4); email exchange with James I. Stang, John W. Lucas, Iain Nasatir, et al. re: same (.10).	2.50	1095.00	\$2,737.50
08/15/2022	GNB	BL	E-mail with Iain A.W. Nasatir and Malhar S. Pagay regarding insurance document negotiations.	0.20	925.00	\$185.00
08/15/2022	IAWN	BL	Revise email to insurers regarding 2004 meet and confer	0.20	1295.00	\$259.00
08/15/2022	IAWN	BL	Exchange emails with James I. Stang and Malhar S. Pagay regarding Global	0.10	1295.00	\$129.50
08/15/2022	IAWN	BL	Exchange emails and telephone calls with Gillian N. Brown and Malhar S. Pagay regarding document production to Madison of insurance	0.30	1295.00	\$388.50
08/15/2022	IAWN	BL	Coordinate sending of meet and confer to insurers	2.30	1295.00	\$2,978.50
08/15/2022	MSP	BL	Telephone call with John W. Lucas re: Rule 2004 motions.	0.30	1095.00	\$328.50
08/15/2022	MSP	BL	Attention to finalizing, filing and service of Rule 2004 motions (2.3); email exchange with Iain Nasatir, Gillian N. Brown, Patricia Jeffries, LaAsia Canty et al. re: same (.20).	2.50	1095.00	\$2,737.50
08/15/2022	MSP	BL	Draft meet and confer letter re: BGCA rule 2004 motion (.6); email exchange with S. Newman, K. Kansa et al. re: same (.10).	0.70	1095.00	\$766.50
08/15/2022	MSP	BL	Attention to insurer-related discovery (2.2); email exchange with Iain Nasatir, M. Levi, Gillian N. Brown, Patricia Jeffries, et al. re: same (.20).	2.40	1095.00	\$2,628.00
08/15/2022	MSP	BL	Work on discovery matters (2.6); email exchange with J. Amala, James I. Stang, et al. re: same (.10).	2.70	1095.00	\$2,956.50
08/15/2022	LSC	BL	Correspondence regarding 2004 motions.	0.20	495.00	\$99.00
08/16/2022	GNB	BL	Email with Malhar S. Pagay regarding Hurwitz Fine's email concerning document requests directed to BCGA.	0.10	925.00	\$92.50

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08/16/2022	IAWN	BL	Further coordination of emailing meet and confer letter to multiple insurers	1.50	1295.00	\$1,942.50
08/16/2022	MSP	BL	Work on discovery matters (1.4); email exchange with M. Williams, James I. Stang, Iain Nasatir, et al. re: same (.10).	1.50	1095.00	\$1,642.50
08/16/2022	MSP	BL	Email with John W. Lucas re: Rule 2004 motions, other case action items.	0.80	1095.00	\$876.00
08/17/2022	GNB	BL	Email with Malhar S. Pagay and John W. Lucas regarding call with Hurwitz Fine on Friday.	0.10	925.00	\$92.50
08/17/2022	GNB	BL	Email with PSZJ team regarding insurer in liquidation.	0.10	925.00	\$92.50
08/17/2022	IAWN	BL	Further coordination of letters to insurers	1.50	1295.00	\$1,942.50
08/17/2022	IAWN	BL	Exchange emails with team regarding liquidation insurer	0.10	1295.00	\$129.50
08/17/2022	MSP	BL	Work on discovery matters (2.7); email exchange with M. Williams, James I. Stang, Gillian N. Brown, John W. Lucas, et al. re: same (.20).	2.90	1095.00	\$3,175.50
08/17/2022	JWL	BL	Email with state court counsel regarding discovery against insurance targets.	0.70	1095.00	\$766.50
08/18/2022	GNB	BL	E-mail with Kerri L. LaBrada regarding access to data site for Debtor's document production from yesterday; E-mail Daniel Finnegan at Teneo and Miriam Levi regarding same.	0.10	925.00	\$92.50
08/18/2022	GNB	BL	E-mail with PSZJ team regarding Rule 2004 motion on Allianz/counsel for Allianz and e-mail from Troutman firm.l regarding same.	0.10	925.00	\$92.50
08/18/2022	GNB	BL	E-mail with Janice Washington regarding tracking document for Rule 2004 motion and meet and confer status.	0.10	925.00	\$92.50
08/18/2022	GNB	BL	Email with Iain A.W. Nasatir and Malhar S. Pagay regarding additionally discovered insurers and Rule 2004 motions directed to same.	0.10	925.00	\$92.50
08/18/2022	IAWN	BL	Arrange to serve Allianz with 2004	0.10	1295.00	\$129.50
08/18/2022	IAWN	BL	Further work on letter to insurers	1.00	1295.00	\$1,295.00
08/18/2022	IAWN	BL	Exchange email with Malhar S. Pagay and Gillian N. Brown regarding unknown insurers	1.00	1295.00	\$1,295.00
08/18/2022	MSP	BL	Work on discovery matters (1.9); email exchange	2.10	1095.00	\$2,299.50

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			with James I. Stang, John W. Lucas, Iain Nasatir, Gillian N. Brown re: same (.20).			
08/18/2022	JWL	BL	Strategy call with J. Amala regarding 2004 insurance targets (1.6); call with J. Freeman regarding insurance discovery (.5).	2.10	1095.00	\$2,299.50
08/18/2022	KLL	BL	Review production by Paul Weiss and assist with issues re same.	1.60	495.00	\$792.00
08/19/2022	GNB	BL	E-mail Kerri L. LaBrada regarding access to Paul Weiss file share; Email with John Hammel Strauss regarding same.	0.10	925.00	\$92.50
08/19/2022	GNB	BL	Email with Kerri L. LaBrada regarding production log.	0.10	925.00	\$92.50
08/19/2022	GNB	BL	Prepare for call with Hurwitz Fine regarding Rule 2004 document requests and email Malhar S. Pagay regarding same (.1); Telephone conference with Malhar S. Pagay regarding same (.1).	0.20	925.00	\$185.00
08/19/2022	GNB	BL	Zoom meet and confer with Malhar S. Pagay and Mike Williams of Hurwitz Fine regarding Committee's Rule 2004 motion directed to BGCA.	0.50	925.00	\$462.50
08/19/2022	GNB	BL	Telephone conference with Malhar S. Pagay following meet and confer with Mike Williams regarding negotiation points.	0.20	925.00	\$185.00
08/19/2022	GNB	BL	Edit draft email from Malhar S. Pagay to state court counsel regarding Rule 2004 motion directed to BGCA.	0.10	925.00	\$92.50
08/19/2022	MSP	BL	Telephone call with Gillian N. Brown re: preparation for meet and confer with BGCA counsel (.10) re: Rule 2004 motion; Telephone call with M. Williams(.50) and with Gillian N. Brown (.20) re: same.	0.80	1095.00	\$876.00
08/19/2022	MSP	BL	Draft update to state court counsel re: BGCA discovery (.7); email exchange with Gillian N. Brown and state court counsel re: same (.10).	0.80	1095.00	\$876.00
08/19/2022	MSP	BL	Email with John W. Lucas re: discovery and case status.	0.30	1095.00	\$328.50
08/19/2022	KLL	BL	Correspond with Paul Weiss on document production sharefile issues.	0.60	495.00	\$297.00
08/22/2022	IAWN	BL	Telephone conference with Clyde regarding insurer objection	0.30	1295.00	\$388.50

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08/22/2022	IAWN	BL	Exchange emails with Perez regarding Great Atlantic	0.10	1295.00	\$129.50
08/22/2022	IAWN	BL	Exchange emails with Plevin regarding email objection	0.10	1295.00	\$129.50
08/22/2022	MSP	BL	Email exchange with John W. Lucas re: meeting of creditors testimony.	0.10	1095.00	\$109.50
08/22/2022	MSP	BL	Email exchange with M. Williams re: initial BGCA production.	0.10	1095.00	\$109.50
08/23/2022	GNB	BL	Email with Iain A.W. Nasatir and Malhar S. Pagay regarding Rule 2004 motion directed to insurers.	0.10	925.00	\$92.50
08/23/2022	GNB	BL	Consider Miriam Levi email regarding Covington report; Email PSZJ team regarding same.	0.10	925.00	\$92.50
08/23/2022	GNB	BL	Email with Kerri L. LaBrada regarding Debtor's production to data site.	0.10	925.00	\$92.50
08/23/2022	IAWN	BL	Telephone conference with Miceli, Drasman and Perez regarding Great Atlantic	0.30	1295.00	\$388.50
08/23/2022	IAWN	BL	Telephone conference with James I. Stang regarding Great Atlantic	0.10	1295.00	\$129.50
08/23/2022	IAWN	BL	Review Plevin email regarding discovery and analyze response	0.80	1295.00	\$1,036.00
08/23/2022	IAWN	BL	Exchange emails with Malhar S. Pagay and Gillian N. Brown regarding Plevin email and debtor documents	0.10	1295.00	\$129.50
08/23/2022	IAWN	BL	Email James I. Stang, Gillian N. Brown, Malhar S. Pagay and John W. Lucas regarding progress with insurers 2004	0.10	1295.00	\$129.50
08/23/2022	JIS	BL	Call with I. Nasatir regarding insurance discovery.	0.10	1525.00	\$152.50
08/23/2022	MSP	BL	Email exchange with Iain Nasatir, et al. re: insurance documents in data room.	0.10	1095.00	\$109.50
08/23/2022	KLL	BL	Correspond to/from Paul Weiss on continued issues of downloads from datasite.	0.70	495.00	\$346.50
08/23/2022	KLL	BL	Upload files from datasite.	0.90	495.00	\$445.50
08/24/2022	GNB	BL	Continued emails with PSZJ team regarding Covington report.	0.20	925.00	\$185.00
08/24/2022	GNB	BL	Email with Mike Williams regarding BGCA document production (.1); Email with Kerri L.	0.20	925.00	\$185.00

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			LaBrada and staff regarding processing of same for upload to Everlaw (.1).			
08/24/2022	GNB	BL	Email with Daniel Finnegan (Teneo), Deborah Spellen, Miriam M Levi, and John Hammel Strauss regarding document productions from Paul Weiss; Email with Lauren Varga regarding same.	0.10	925.00	\$92.50
08/24/2022	IAWN	BL	Exchange emails with team regarding Covington report	0.20	1295.00	\$259.00
08/24/2022	IAWN	BL	Exchange emails with Perez regarding 2004 agreement	0.20	1295.00	\$259.00
08/24/2022	IAWN	BL	Exchange emails with Clyde & Co. regarding agreement on 2004	0.10	1295.00	\$129.50
08/24/2022	IAWN	BL	Exchange emails with Gillian N. Brown regarding new documents from debtors	0.10	1295.00	\$129.50
08/24/2022	IAWN	BL	Exchange emails with counsel for Travelers regarding 2004	0.10	1295.00	\$129.50
08/24/2022	IAWN	BL	Exchange emails with PIC regarding 2004 and directors and officers policies	0.20	1295.00	\$259.00
08/24/2022	IAWN	BL	Exchange emails with Allianz regarding 2004 and service	0.10	1295.00	\$129.50
08/24/2022	MSP	BL	Email exchange with Gillian N. Brown, et al. re: Covington report.	0.10	1095.00	\$109.50
08/24/2022	BEL	BL	Review local rules and emails with Gillian N. Brown regarding local rules and certification of no objection.	0.30	1045.00	\$313.50
08/24/2022	KLL	BL	Review documents on datasite and correspond regarding issues to same.	0.70	495.00	\$346.50
08/25/2022	GNB	BL	Email with Iain A.W. Nasatir regarding insurance-related discovery.	0.10	925.00	\$92.50
08/25/2022	GNB	BL	Email with Kerri L. LaBrada, Gini L. Downing, and Ben Downing regarding project to rename pdfs produced by Debtor for upload to Everlaw; Review Kerri L. LaBrada email to Paul Weiss regarding missing bates numbers on Excels produced by Madison.	0.10	925.00	\$92.50
08/25/2022	GNB	BL	Email with IslandDundon team regarding call tomorrow in advance of Committee call on Monday; Email with Lauren Varga regarding document productions from Debtor.	0.10	925.00	\$92.50

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08/25/2022	IAWN	BL	Telephone conference with team regarding committee issues	0.90	1295.00	\$1,165.50
08/25/2022	MSP	BL	Telephone call with Gillian N. Brown re: discovery tasks.	0.20	1095.00	\$219.00
08/25/2022	MSP	BL	Work on discovery matters and draft informal document request (1.4); email exchange with John W. Lucas, et al. re: same (.10).	1.50	1095.00	\$1,642.50
08/25/2022	KLL	BL	Telephone call with Paul Weiss regarding issues on datasite uploads.	0.50	495.00	\$247.50
08/25/2022	KLL	BL	Review and upload additional documents produced to Everlaw.	1.40	495.00	\$693.00
08/25/2022	KLL	BL	Review documents produced by BCGA and relate issues to same for upload to Everlaw.	0.40	495.00	\$198.00
08/26/2022	GNB	BL	Telephone conference with James I. Stang (partial attendance), John W. Lucas, Tabish Rizvi, and Steven Landgraber in preparation for Monday's Committee meeting and Monday's IslandDundon meeting with Teneo.	0.90	925.00	\$832.50
08/26/2022	GNB	BL	Analyze seven (7) objections to Committee's Rule 2004 motion for production of documents directed to insurers.	0.10	925.00	\$92.50
08/26/2022	GNB	BL	Email with PSZJ and Michelle Cano at Legal Vision regarding BCGA documents for Everlaw upload (.1); Email Michael Williams regarding bates labeling of his document production on behalf of BCGA (.1).	0.20	925.00	\$185.00
08/26/2022	IAWN	BL	Review insurer objections	3.80	1295.00	\$4,921.00
08/26/2022	IAWN	BL	Exchange emails with Gillian N. Brown regarding service	0.10	1295.00	\$129.50
08/26/2022	IAWN	BL	Review appearances in Madison regarding discovery	0.30	1295.00	\$388.50
08/26/2022	KLL	BL	Pull production by BGCA and correspond with vendor to update files correctly for uploading to Everlaw.	0.60	495.00	\$297.00
08/26/2022	KLL	BL	Upload corrected data file re BGCA to Everlaw.	0.40	495.00	\$198.00
08/26/2022	KLL	BL	Review corrected files re Paul Weiss Excel spreadsheets and upload same to Everlaw.	0.60	495.00	\$297.00
08/27/2022	GNB	BL	Analyze seven (7) objections to Committee's Rule 2004 motion for production of documents and oral	3.90	925.00	\$3,607.50

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			examination directed to insurers (3.7); Email PSZJ team regarding same (.2).			
08/27/2022	GNB	BL	Draft Reply to objections to Rule 2004 motion for production of documents and oral examination directed to certain insurers.	2.90	925.00	\$2,682.50
08/27/2022	IAWN	BL	Review Gillian N. Brown summary and provide outline for reply	3.50	1295.00	\$4,532.50
08/28/2022	GNB	BL	Draft Reply to objections to Rule 2004 motion for production of documents and oral examination directed to certain insurers.	1.80	925.00	\$1,665.00
08/28/2022	GNB	BL	Revise and edit Reply to objections to Rule 2004 motion for production of documents and oral examination directed to certain insurers and the declaration of Iain A.W. Nasatir in support thereof.	0.80	925.00	\$740.00
08/28/2022	GNB	BL	Email Tabish Rizvi regarding follow up on financial information discussion on August 26.	0.10	925.00	\$92.50
08/28/2022	GNB	BL	Email John Weber and Miriam Levi regarding document requests relating to annual reports and audits; Email with Malhar S. Pagay regarding same.	0.10	925.00	\$92.50
08/28/2022	IAWN	BL	Review insurer offers/2004	0.80	1295.00	\$1,036.00
08/28/2022	IAWN	BL	Revise brief and Iain A.W. Nasatir declaration	2.80	1295.00	\$3,626.00
08/28/2022	IAWN	BL	Review list of emails addresses for service compiled by assistant	0.30	1295.00	\$388.50
08/28/2022	IAWN	BL	Exchange emails with Gillian N. Brown regarding list	0.10	1295.00	\$129.50
08/28/2022	IAWN	BL	Review WIP agenda	0.10	1295.00	\$129.50
08/28/2022	IAWN	BL	Review Gillian N. Brown email to debtor regarding financials	0.10	1295.00	\$129.50
08/28/2022	MSP	BL	Work on discovery matters, including informal request to debtors (.4); email exchange with James I. Stang, John W. Lucas, Gillian N. Brown, et al. re: same (.10).	0.50	1095.00	\$547.50
08/29/2022	GNB	BL	Email with Michael Williams regarding meet and confer concerning BCGA documents; Email with Gini L. Downing regarding supplemental service list for reply brief today.	0.10	925.00	\$92.50
08/29/2022	GNB	BL	Email with state court regarding edits to reply brief (on Rule 2004 motion directed to certain insurers).	0.10	925.00	\$92.50



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08/29/2022	GNB	BL	Email with Kerri LaBrada regarding certificate of no objection relating to docket no. 111.	0.10	925.00	\$92.50
08/29/2022	GNB	BL	Review Miriam Levi draft agenda for August 31 hearing; Email with John W. Lucas and Miriam Levi regarding edit to same.	0.10	925.00	\$92.50
08/29/2022	GNB	BL	Revise and finalize reply brief (on Rule 2004 motion directed to certain insurers) along with associated papers.	3.40	925.00	\$3,145.00
08/29/2022	GNB	BL	Review and edit service lists for various filings today (.4); Telephone conference with Sophia L. Lee regarding service of papers today (.1).	0.50	925.00	\$462.50
08/29/2022	GNB	BL	Revise and edit certification of non-objecting insurers to Rule 2004 motion.	0.70	925.00	\$647.50
08/29/2022	GNB	BL	Email with PSZJ team regarding Wednesday hearing on Rule 2004 motions.	0.10	925.00	\$92.50
08/29/2022	GNB	BL	Email with Iain A.W. Nasatir regarding Gregg Galardi questions relating to Rule 2004 motion to insurers.	0.10	925.00	\$92.50
08/29/2022	GNB	BL	Telephone conference and email with Janice Washington regarding bounce back emails to insurers and insurance counsel.	0.10	925.00	\$92.50
08/29/2022	IAWN	BL	Telephone conference with Committee regarding 2004	0.50	1295.00	\$647.50
08/29/2022	IAWN	BL	Review discovery documents for reply and oral argument	2.00	1295.00	\$2,590.00
08/29/2022	IAWN	BL	Review Gillian N. Brown draft of reply for 2004	0.20	1295.00	\$259.00
08/29/2022	IAWN	BL	Coordinate email discovery offer to all insurers	3.50	1295.00	\$4,532.50
08/29/2022	IAWN	BL	Review email file regarding Allianz service	0.10	1295.00	\$129.50
08/29/2022	IAWN	BL	Engage in meet and confers with PIC, GA, AS and other insurers regarding 2004	1.50	1295.00	\$1,942.50
08/29/2022	IAWN	BL	Exchange emails with Kerri LaBrada and Gillian N. Brown regarding filing deadline re reply brief	0.10	1295.00	\$129.50
08/29/2022	IAWN	BL	Exchange emails with Gillian N. Brown regarding timing of reply review re Rule 2004	0.10	1295.00	\$129.50
08/29/2022	IAWN	BL	Final edits to brief and declaration re Rule 2004	0.80	1295.00	\$1,036.00
08/29/2022	IAWN	BL	Review each set of emails to insurers to confirm	0.70	1295.00	\$906.50

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			correct addressee			
08/29/2022	IAWN	BL	Exchange emails with Gillian N. Brown regarding hearing binder	0.10	1295.00	\$129.50
08/29/2022	MSP	BL	Email exchange with John W. Lucas re: case litigation status.	0.10	1095.00	\$109.50
08/29/2022	KLL	BL	Prepare certificate of no objection to 2004 motion.	0.80	495.00	\$396.00
08/30/2022	GNB	BL	Prepare for telephonic meet and confer with Michael Williams regarding BGCA document production.	0.50	925.00	\$462.50
08/30/2022	GNB	BL	Telephonic meet and confer with Michael Williams regarding BGCA document production.	0.10	925.00	\$92.50
08/30/2022	GNB	BL	Email with Michael Williams regarding BGCA proposed order.	0.10	925.00	\$92.50
08/30/2022	GNB	BL	Email and telephone conference with Oliver Carpio regarding certificates of service for papers filed today (.1); Revise Oliver Carpio's certificate of service (.1); Instruct Oliver Carpio regarding filing of papers today (.1).	0.30	925.00	\$277.50
08/30/2022	GNB	BL	Analyze Gregg Galardi's response to certification of no objection to Rule 2004 motion directed to insurers (.1); Email with Iain A.W. Nasatir regarding same (.1).	0.20	925.00	\$185.00
08/30/2022	GNB	BL	Telephone conference with James I. Stang regarding Rule 2004 motion directed to insurers; Review email from Jason Amala regarding same.	0.10	925.00	\$92.50
08/30/2022	GNB	BL	Review and respond to Lauren Varga email regarding documents from the Debtor, including email with Malhar S. Pagay regarding same.	0.10	925.00	\$92.50
08/30/2022	GNB	BL	Prepare Iain A.W. Nasatir by email for tomorrow's hearing on Rule 2004 motion directed to insurers.	0.30	925.00	\$277.50
08/30/2022	GNB	BL	Email with PSZJ attorneys regarding potential resolution of Rule 2004 motions.	0.20	925.00	\$185.00
08/30/2022	GNB	BL	Email with Miriam Levi regarding amended agenda for tomorrow's hearing; Email with Malhar S. Pagay regarding same.	0.10	925.00	\$92.50
08/30/2022	GNB	BL	Review Iain A.W. Nasatir email regarding meet and confer with Gregg Galardi on Rule 2004 motion directed to insurers.	0.10	925.00	\$92.50
08/30/2022	IAWN	BL	Review voicemail from Plevin regarding meet and	0.10	1295.00	\$129.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			confer			
08/30/2022	IAWN	BL	Prepare for hearing on Rule 2004 motions	2.50	1295.00	\$3,237.50
08/30/2022	JIS	BL	Call with J. Lucas regarding 8.31 hearing agenda (employment and R2004 exams).	0.10	1525.00	\$152.50
08/30/2022	MSP	BL	Email exchange with Iain Nasatir, et al. re: scheduling of hearings re: Rule 2004 motions.	0.10	1095.00	\$109.50
08/30/2022	MSP	BL	Work on discovery matters (1.0); email exchange with John W. Lucas, Gillian N. Brown, et al. re: same (.10).	1.10	1095.00	\$1,204.50
08/30/2022	JWL	BL	Prepare status summary for chambers regarding 2004 motions set for hearing on Aug. 31, 2022 (.5);	0.50	1095.00	\$547.50
08/31/2022	GNB	BL	Email with Iain A.W. Nasatir in preparation for today's hearing relating to Rule 2004 motion directed to insurers.	0.20	925.00	\$185.00
08/31/2022	GNB	BL	Revise proposed order on Rule 2004 motion directed to BGCA.	0.30	925.00	\$277.50
08/31/2022	GNB	BL	Telephone conference with Iain A.W. Nasatir regarding today's hearing on Rule 2004 motion directed to insurers.	0.10	925.00	\$92.50
08/31/2022	GNB	BL	Email Iain A.W. Nasatir with regard to revisions to proposed order on Rule 2004 motion directed to insurers.	0.10	925.00	\$92.50
08/31/2022	GNB	BL	Email Michael A. Matteo regarding preparation of subpoenas directed to BGCA and to insurers.	0.10	925.00	\$92.50
08/31/2022	GNB	BL	Review email from Gary Seligman regarding proposed order on Rule 2004 motion directed to insurers; Review email from John Weber requesting cc on emails regarding proposed orders on Rule 2004 motions.	0.10	925.00	\$92.50
08/31/2022	IAWN	BL	Telephone conferences with Plevin regarding meet and confer	1.00	1295.00	\$1,295.00
08/31/2022	IAWN	BL	Telephone conferences with Galardi regarding meet and confer	1.00	1295.00	\$1,295.00
08/31/2022	IAWN	BL	Attend hearing on Rule 2004 motions	1.00	1295.00	\$1,295.00
08/31/2022	IAWN	BL	Telephone conference with James I. Stang regarding hearing	0.10	1295.00	\$129.50
08/31/2022	IAWN	BL	Exchange email and telephone call with Carlton Fields regarding hearing	0.10	1295.00	\$129.50

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08/31/2022	IAWN	BL	Exchange telephone call and email with Miller regarding hearing	0.10	1295.00	\$129.50
08/31/2022	IAWN	BL	Telephone call with Gillian N. Brown regarding hearing	0.10	1295.00	\$129.50
08/31/2022	IAWN	BL	Exchange emails with Gillian N. Brown regarding revising order	0.10	1295.00	\$129.50
08/31/2022	JIS	BL	Attend hearing regarding Rule 2004 exams and employment.	1.00	1525.00	\$1,525.00
08/31/2022	MAM	BL	Create subpoena tracking chart.	0.20	460.00	\$92.00
08/31/2022	MSP	BL	Email exchange with Iain Nasatir, Gillian N. Brown, et al. re: hearings re: Rule 2004 examinations.	0.10	1095.00	\$109.50
08/31/2022	MSP	BL	Email exchange with Gillian N. Brown, et al. re: resolution of BGCA discovery issues.	0.20	1095.00	\$219.00
08/31/2022	BDD	BL	Email G. Brown re uploading docs to Everlaw.	0.10	495.00	\$49.50
				<b>149.70</b>		<b>\$158,346.50</b>

### Case Administration [B110]

08/01/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
08/02/2022	JIS	CA	Call with UST re case status.	0.70	1525.00	\$1,067.50
08/02/2022	JWL	CA	Prepare summary of purpose of 341 meeting for committee (.6);	0.60	1095.00	\$657.00
08/03/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
08/05/2022	JWL	CA	Email to committee regarding scope and procedure for 341 meeting (.4);	0.40	1095.00	\$438.00
08/05/2022	KLL	CA	Update critical dates memo.	0.20	495.00	\$99.00
08/09/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
08/09/2022	KLL	CA	Finalize Committee Confidentiality Motion for filing with the Court.	0.60	495.00	\$297.00
08/11/2022	KLL	CA	Email judge's chambers with copy of proposed order re M. Pagay Pro Hac Vice Motion.	0.40	495.00	\$198.00
08/12/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
08/15/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
08/16/2022	KLL	CA	Update critical dates memo.	0.40	495.00	\$198.00

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08/18/2022	KLL	CA	Correspond with transcriber on request submission for 341(a) meeting transcript.	0.40	495.00	\$198.00
08/19/2022	KLL	CA	Email court clerk on presentment of proposed order to Committee's confidential motion.	0.30	495.00	\$148.50
08/19/2022	KLL	CA	Correspond with Veritext on issues obtaining audio from UST re 341a meeting.	0.30	495.00	\$148.50
08/24/2022	KLL	CA	Correspond internally re submission of proposed order on Committee protocol motion.	0.30	495.00	\$148.50
08/27/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
08/29/2022	GNB	CA	Revise email response to Andrea Schwartz regarding email to Oliver Carpio regarding email service.	0.10	925.00	\$92.50
08/29/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
08/30/2022	BDD	CA	Email G. Brown re case tasks.	0.10	495.00	\$49.50
				<b>6.90</b>		<b>\$4,779.50</b>

#### **Claims Admin/Objections[B310]**

08/02/2022	JWL	CO	Collect changes to claim form from counsel (1.1); call with Madison's counsel regarding changes to claim form, deadline (.1);	1.20	1095.00	\$1,314.00
08/04/2022	JWL	CO	Review comments from committee and state court counsel to proposed proof of claim form (.7).	0.70	1095.00	\$766.50
08/05/2022	JWL	CO	Review Madison changes to claim form, bar date order, notice and respond with comments.	1.00	1095.00	\$1,095.00
08/09/2022	JWL	CO	Emails with M. Levi regarding claim form	0.20	1095.00	\$219.00
08/10/2022	MSP	CO	Prepare for hearing re: Bar Date Motion and other matters (.7); email exchange with John W. Lucas re: same (.10).	0.80	1095.00	\$876.00
08/10/2022	MSP	CO	Email exchange with J. Weber, John W. Lucas, et al. re: comments on claim form.	0.30	1095.00	\$328.50
08/10/2022	JWL	CO	Review proposed changes to definition of "abuse" (.2); review claim form and email M. Levi regarding fixes to fillable form (.5).	0.70	1095.00	\$766.50
08/11/2022	MSP	CO	Draft summary of hearing for clients (.4); email exchange with James I. Stang, Committee members, state court counsel, et al. re: same (.20).	0.60	1095.00	\$657.00
08/11/2022	MSP	CO	Review and analysis of additional modifications to	1.00	1095.00	\$1,095.00

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			survivor claim form Email exchange with M. Plevin, John W. Lucas, J. Weber, M. Levi, et al.			
08/11/2022	MSP	CO	Appear at hearing regarding Bar Date Motion and other matters.	1.60	1095.00	\$1,752.00
08/11/2022	MSP	CO	Telephone call with John W. Lucas re: Court hearing status.	0.20	1095.00	\$219.00
08/11/2022	MSP	CO	Telephone calls (2) with John W. Lucas re: Proof of Claim forms, Rule 2004 motions, etc.	0.20	1095.00	\$219.00
08/11/2022	JWL	CO	Emails with Madison's counsel and Federal's counsel regarding changes to abuse claim form (.5); review and respond to changes to claim form by UST (.2); review and respond to changes to bar date order by UST (.5).	1.20	1095.00	\$1,314.00
08/12/2022	JWL	CO	Prepare email to committee and counsel regarding bar date order, deadline, and claim form (.6).	0.60	1095.00	\$657.00
08/26/2022	JWL	CO	Call with L. Leder regarding uploading completed forms to the claim portal (.2); calls with Epiq regarding same (.7);	0.90	1095.00	\$985.50
08/30/2022	JWL	CO	Respond to questions from survivor counsel regarding abuse proof of claims (.5);	0.50	1095.00	\$547.50
				<b>11.70</b>		<b>\$12,811.50</b>

#### **Financing [B230]**

08/16/2022	GNB	FN	Email IslandDundon regarding financial issues and monthly operating report.	0.10	925.00	\$92.50
08/22/2022	JIS	FN	Email to Financial Advisor regarding financial analysis for offer.	0.20	1525.00	\$305.00
08/30/2022	GNB	FN	Email with John W. Lucas regarding Teneo's request for Committee professionals' budget; Review Tabish Rizvi email regarding same.	0.10	925.00	\$92.50
				<b>0.40</b>		<b>\$490.00</b>

#### **General Creditors Comm. [B150]**

08/01/2022	JIS	GC	Review/revise agenda.	0.20	1525.00	\$305.00
08/01/2022	JIS	GC	Draft July 25 minutes.	0.30	1525.00	\$457.50
08/01/2022	JIS	GC	Call with J. Lucas regarding 8/01 agenda and outstanding documents out for comment.	0.20	1525.00	\$305.00

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08/01/2022	JIS	GC	Committee call regarding case status.	1.20	1525.00	\$1,830.00
08/01/2022	MSP	GC	Email exchange with John W. Lucas re: Committee meeting.	0.10	1095.00	\$109.50
08/01/2022	JWL	GC	Prepare agenda for Aug. 1 committee meeting (.5); send administrative emails to committee chairs regarding retentions, minutes, bylaws (.5); attend weekly committee (1.2); circulate claim form to state court counsel for further comments (.2).	2.40	1095.00	\$2,628.00
08/04/2022	MSP	GC	Attend state court counsel meeting.	0.50	1095.00	\$547.50
08/04/2022	JWL	GC	Attend weekly state court counsel call with J. Stang and counsel to committee members.	0.50	1095.00	\$547.50
08/05/2022	JWL	GC	Draft minutes for Aug. 1, 2022 committee meeting.	0.60	1095.00	\$657.00
08/06/2022	MSP	GC	Email exchange with John W. Lucas re: Committee meeting.	0.10	1095.00	\$109.50
08/08/2022	MSP	GC	Attend Committee meeting.	1.40	1095.00	\$1,533.00
08/08/2022	JWL	GC	Prepare for (.2) and attend weekly committee meeting regarding case status (1.4).	1.60	1095.00	\$1,752.00
08/09/2022	MSP	GC	Telephone call with James I. Stang re: hearing coverage; email exchange with John W. Lucas re: same.	0.20	1095.00	\$219.00
08/12/2022	MSP	GC	Email exchange with Committee members and counsel re: status update re: Rule 2004 motions.	0.40	1095.00	\$438.00
08/15/2022	GNB	GC	E-mail with John W. Lucas regarding addendum to email to Committee regarding 341(a).	0.10	925.00	\$92.50
08/15/2022	JIS	GC	Committee meeting including meeting with mediator, review of claims valuation issues, 341 meeting issues.	1.20	1525.00	\$1,830.00
08/15/2022	JIS	GC	Draft minutes of 8.15 committee meeting.	0.30	1525.00	\$457.50
08/15/2022	JIS	GC	Call J. Lucas re case status and pending motions.	0.20	1525.00	\$305.00
08/15/2022	MSP	GC	Attend Committee meeting.	1.20	1095.00	\$1,314.00
08/15/2022	JWL	GC	Review and revise committee meeting minutes from Aug. 15 meeting (.2).	0.20	1095.00	\$219.00
08/16/2022	GNB	GC	Email with Jason Amala regarding mediation issues.	0.10	925.00	\$92.50
08/17/2022	GNB	GC	Email with Committee members and PSZJ team regarding mediation and discovery.	0.10	925.00	\$92.50

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08/18/2022	IAWN	GC	Telephone conference with SCC regarding status	0.50	1295.00	\$647.50
08/18/2022	JIS	GC	Call with state court counsel regarding meeting of creditors, mediation, insurance.	0.50	1525.00	\$762.50
08/18/2022	MSP	GC	Attend state court counsel meeting.	0.50	1095.00	\$547.50
08/18/2022	JWL	GC	Attend call with state court counsel regarding strategy.	0.50	1095.00	\$547.50
08/22/2022	IAWN	GC	Telephone conference with Committee regarding status	1.00	1295.00	\$1,295.00
08/22/2022	JIS	GC	Call J. Lucas re call with Mediator and agenda for upcoming call with Committee.	0.20	1525.00	\$305.00
08/22/2022	JWL	GC	Prepare agenda for Aug. 22 committee meeting (.4); attend committee meeting regarding case updates (1.0).	1.40	1095.00	\$1,533.00
08/24/2022	MSP	GC	Telephone call with John W. Lucas re: work in process, action items.	0.10	1095.00	\$109.50
08/24/2022	MSP	GC	Email exchange with Gillian N. Brown, John W. Lucas, et al. re: creditor information motion.	0.10	1095.00	\$109.50
08/25/2022	GNB	GC	Telephone conference with James I. Stang, Iain A.W. Nasatir, Malhar S. Pagay, and John W. Lucas regarding Committee-related issues.	0.90	925.00	\$832.50
08/25/2022	IAWN	GC	Telephone call with SCC regarding status	0.50	1295.00	\$647.50
08/25/2022	JIS	GC	Call with PSZJ reviewing status of case and issues: employment, discovery, insurance Rule 2004 exams, mediation.	0.90	1525.00	\$1,372.50
08/25/2022	JIS	GC	Call with state court counsel regarding status of discovery, insurance, employment of PSZJ and UST comments.	0.50	1525.00	\$762.50
08/25/2022	MSP	GC	Meeting with James I. Stang, John W. Lucas, et al. re: work in process, action items.	0.90	1095.00	\$985.50
08/25/2022	MSP	GC	Attend state court counsel meeting.	0.50	1095.00	\$547.50
08/25/2022	JWL	GC	Prepare agenda for work in progress call with PSZJ team (.3); attend work in progress call with PSZJ team (.9); attend weekly state court counsel call regarding strategy and case update (.5);	1.70	1095.00	\$1,861.50
08/26/2022	IAWN	GC	Telephone conference with SCC regarding discovery	0.60	1295.00	\$777.00
08/26/2022	JWL	GC	Attend PSZJ / Dundon call regarding case	0.90	1095.00	\$985.50



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			management and work streams for Committee (.9);			
08/28/2022	GNB	GC	Email with State Court Counsel regarding reply to objections to Rule 2004 motion for production of documents and oral examination directed to certain insurers.	0.30	925.00	\$277.50
08/29/2022	GNB	GC	Zoom Committee meeting regarding current issues.	0.60	925.00	\$555.00
08/29/2022	JIS	GC	(Partial) attend committee meeting.	0.20	1525.00	\$305.00
08/29/2022	MSP	GC	Telephone call with John W. Lucas re: pending case matters.	0.20	1095.00	\$219.00
08/29/2022	JWL	GC	Prepare minutes for Aug. 22 committee meeting (.5); prepare agenda for Aug. 29 committee meeting (.5); prepare for (.2) and attend Aug. 29 committee meeting (.6); prepare minutes for Aug. 29 committee meeting (.4);	2.20	1095.00	\$2,409.00
08/30/2022	MSP	GC	Telephone call with John W. Lucas re: pending case matters.	0.20	1095.00	\$219.00
08/30/2022	MSP	GC	Email exchange with Gillian N. Brown, John W. Lucas, M. Levi, et al. re: amended agenda notice.	0.10	1095.00	\$109.50
				<b>29.10</b>		<b>\$34,564.50</b>

### Meeting of Creditors [B150]

08/05/2022	JIS	MC	Review/revise memo to Committee about 341 meeting and its purposes.	0.40	1525.00	\$610.00
08/16/2022	JIS	MC	Call J. Lucas regarding preparation for meeting of creditors.	0.10	1525.00	\$152.50
08/16/2022	JIS	MC	Review SOFA/SOAL and IRS 990s for Debtor, Foundation and National in preparation for 341 meeting.	2.50	1525.00	\$3,812.50
08/16/2022	MSP	MC	Telephone call with A. Schwartz re: questioning at 341(a) meeting.	0.10	1095.00	\$109.50
08/16/2022	MSP	MC	Telephone call with John W. Lucas re: 341(a) meeting.	0.10	1095.00	\$109.50
08/16/2022	JWL	MC	Review schedules and statements and prepare questions for section 341 meeting (1.8);	1.80	1095.00	\$1,971.00
08/17/2022	JIS	MC	Attend meeting of creditors.	1.60	1525.00	\$2,440.00
08/17/2022	MSP	MC	Attend meeting of creditors.	1.60	1095.00	\$1,752.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/17/2022	JWL	MC	Attend Madison section 341 meeting (1.6);	1.60	1095.00	\$1,752.00
				<b>9.80</b>		<b>\$12,709.00</b>

### Mediation

08/01/2022	IAWN	ME	Review SCC emails regarding mediation statement	0.10	1295.00	\$129.50
08/01/2022	IAWN	ME	Review mediation statement	0.50	1295.00	\$647.50
08/01/2022	JIS	ME	Review email with comments regarding mediation statement factual background.	0.10	1525.00	\$152.50
08/01/2022	JIS	ME	Review/revise mediation statement.	0.30	1525.00	\$457.50
08/01/2022	JWL	ME	Review background materials for mediation statement.	2.20	1095.00	\$2,409.00
08/02/2022	JWL	ME	Further review and revisions to mediation statement.	1.30	1095.00	\$1,423.50
08/03/2022	GNB	ME	Review recently filed pleadings; E-mail to Kerri L. LaBrada regarding same; Review emails from state court counsel regarding mediation statement.	0.10	925.00	\$92.50
08/03/2022	IAWN	ME	Mediation	1.00	1295.00	\$1,295.00
08/03/2022	JIS	ME	Call J. Lucas regarding mediation statement and pending pleadings.	0.10	1525.00	\$152.50
08/03/2022	JIS	ME	Review/revise mediation statement.	1.00	1525.00	\$1,525.00
08/03/2022	MSP	ME	Email exchange with John W. Lucas re: Rule 2004 information for mediation statement.	0.10	1095.00	\$109.50
08/03/2022	JWL	ME	Review and revise mediation statement in response to comments from state court counsel (1.5); review and compile exhibits for mediation statement (1.0).	2.50	1095.00	\$2,737.50
08/05/2022	JWL	ME	Call with Mediator and J. Stang.	0.60	1095.00	\$657.00
08/09/2022	IAWN	ME	Telephone conference with debtor coverage counsel regarding insurance under mediation privilege	0.10	1295.00	\$129.50
08/09/2022	IAWN	ME	Exchange emails with PSZJ team regarding insurance mediation success	0.20	1295.00	\$259.00
08/15/2022	IAWN	ME	Telephone conference with John Lucas regarding mediation call	0.10	1295.00	\$129.50
08/15/2022	IAWN	ME	Telephone conference with state court counsel and mediator	1.50	1295.00	\$1,942.50
08/15/2022	IAWN	ME	Telephone conference with state court counsel	1.20	1295.00	\$1,554.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding mediation			
08/15/2022	JIS	ME	Email to mediator regarding additional mediation party.	0.20	1525.00	\$305.00
08/15/2022	MSP	ME	Email exchange with James I. Stang et al. re: Mediation party.	0.10	1095.00	\$109.50
08/15/2022	JWL	ME	Prepare for and attend mediation session with mediator, committee members, and state court counsel (1.5); attend mediation session with committee (1.2);	2.70	1095.00	\$2,956.50
08/22/2022	JIS	ME	Call with mediator re status of negotiations.	0.30	1525.00	\$457.50
08/22/2022	JWL	ME	Attend mediation session with J. Chapman and J. Stang (.5);	0.50	1095.00	\$547.50
				<b>16.80</b>		<b>\$20,179.00</b>

**Retention of Prof. [B160]**

08/01/2022	GNB	RP	Review conflict check information (.1); Email Aaron Bonn and Erick Marroquin regarding same (.2) (Sweden time zone).	0.30	925.00	\$277.50
08/02/2022	GFB	RP	Review and analyze conflicts data.	0.40	995.00	\$398.00
08/02/2022	GNB	RP	Review conflict check information part 2 and 3 (.1); Email Malhar S. Pagay, John W. Lucas, and Aaron Bonn regarding same (.1)(Sweden time zone).	0.20	925.00	\$185.00
08/02/2022	MSP	RP	Attention to retention issues (1.6); email exchange with Gina F. Brandt, et al. re: same (.10).	1.70	1095.00	\$1,861.50
08/03/2022	GFB	RP	Review and analyze conflicts data (.6); draft emails to Michael Warner and Malhar Pagay (.2).	0.80	995.00	\$796.00
08/03/2022	MSP	RP	Email exchange with Gini F. Brandt, et al. re: retention issues.	0.10	1095.00	\$109.50
08/11/2022	GNB	RP	E-mail with John W. Lucas regarding compensation and retention application.	0.10	925.00	\$92.50
08/11/2022	KLL	RP	Email judge's chambers with copy of proposed order re J. Stang Pro Hac Vice Motion.	0.40	495.00	\$198.00
08/12/2022	MSP	RP	Email exchange with Kelly L. LaBrada re: PSZJ retention hearing.	0.10	1095.00	\$109.50
08/15/2022	GNB	RP	Review local rules regarding scheduling of motion to employ PSZJ in connection with Andrea Schwartz email stating 21 days' notice (.1); E-mail with PSZJ	0.20	925.00	\$185.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			team regarding same (.1)			
08/15/2022	GNB	RP	Email with Oliver Carpio regarding courtesy copies of papers filed today.	0.10	925.00	\$92.50
08/15/2022	LSC	RP	Research and correspondence regarding PSZJ retention application.	0.20	495.00	\$99.00
08/15/2022	KLL	RP	Review US Trustee Guidelines on Retention Application Objection Procedures.	0.30	495.00	\$148.50
08/24/2022	GNB	RP	Draft email response for John Lucas to send Andrea Schwartz regarding extension of time to object to PSZJ employment application; Review Chambers' rules regarding same; Email Kerri L. LaBrada regarding deadlines for PSZJ employment applications.	0.10	925.00	\$92.50
08/25/2022	GNB	RP	Email with Miriam Levi and Lauren Varga regarding supplemental conflict check list; Email Aaron Bonn and Erick Marroquin regarding same; Review results of conflict check and email John W. Lucas regarding same.	0.10	925.00	\$92.50
08/26/2022	GNB	RP	Review Judge Lane's chamber rules in connection with Andrea Schwartz email requesting extension of time to respond to PSZJ employment application; Email John W. Lucas regarding Ms. Ebanks email and timing for extension.	0.10	925.00	\$92.50
08/26/2022	GNB	RP	Review and edit exhibits to James I. Stang's supplemental declaration in support of PSZJ's employment application.	0.20	925.00	\$185.00
08/26/2022	JIS	RP	Review JIS supplemental declaration.	0.10	1525.00	\$152.50
08/30/2022	GNB	RP	Email with John W. Lucas regarding withdrawal of U.S. Trustee opposition to PSZJ employment application and steps going forward.	0.10	925.00	\$92.50
08/30/2022	GNB	RP	Revise email to Chambers regarding proposed order granting PSZJ's employment application.	0.10	925.00	\$92.50
08/30/2022	GNB	RP	Review and edit certification of no objection to PSZJ employment application.	0.20	925.00	\$185.00
08/30/2022	KLL	RP	Prepare certificate of no objection to Pachulski retention application.	0.70	495.00	\$346.50
				<b>6.60</b>		<b>\$5,884.00</b>

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Ret. of Prof./Other</b>						
08/08/2022	JWL	RPO	Call with M. Dundon regarding engagement.	0.30	1095.00	\$328.50
08/19/2022	JWL	RPO	Review and revise Dundon retention application.	1.30	1095.00	\$1,423.50
08/23/2022	JWL	RPO	Finalize Dundon retention application and ready for filing.	0.70	1095.00	\$766.50
08/23/2022	KLL	RPO	Review and correspond with J. Lucas on notice of presentment on Dundon retention application.	0.40	495.00	\$198.00
08/26/2022	JWL	RPO	Finalize Dundon retention application for filing.	0.50	1095.00	\$547.50
				<b>3.20</b>		<b>\$3,264.00</b>
<b>Stay Litigation [B140]</b>						
08/30/2022	JIS	SL	Call/email state court counsel regarding scope of Madison automatic stay.	0.30	1525.00	\$457.50
				<b>0.30</b>		<b>\$457.50</b>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$254,095.50</b>

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**Expenses**

08/08/2022	RE2	SCAN/COPY ( 29 @0.10 PER PG)	2.90
08/08/2022	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
08/08/2022	RE2	SCAN/COPY ( 18 @0.10 PER PG)	1.80
08/08/2022	RE2	SCAN/COPY ( 58 @0.10 PER PG)	5.80
08/08/2022	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00
08/08/2022	RE2	SCAN/COPY ( 29 @0.10 PER PG)	2.90
08/08/2022	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
08/08/2022	RE2	SCAN/COPY ( 62 @0.10 PER PG)	6.20
08/08/2022	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
08/09/2022	PO	Postage	4.20
08/09/2022	PO	Postage	124.26
08/09/2022	RE	( 689 @0.10 PER PG)	68.90
08/09/2022	RE	( 1595 @0.10 PER PG)	159.50
08/09/2022	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
08/09/2022	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
08/09/2022	RE2	SCAN/COPY ( 76 @0.10 PER PG)	7.60
08/09/2022	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
08/09/2022	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00
08/09/2022	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
08/10/2022	FF	Filing Fee [E112] USBC NY, Pro Hac Vice Filing Fee, JW	200.00
08/12/2022	LN	54162.00004 Lexis Charges for 08-12-22	22.46
08/15/2022	FE	54162.00004 FedEx Charges for 08-15-22	31.31
08/15/2022	FE	54162.00004 FedEx Charges for 08-15-22	25.03
08/15/2022	FE	54162.00004 FedEx Charges for 08-15-22	25.03
08/15/2022	FE	54162.00004 FedEx Charges for 08-15-22	25.03
08/15/2022	FE	54162.00004 FedEx Charges for 08-15-22	25.03
08/15/2022	FE	54162.00004 FedEx Charges for 08-15-22	25.03
08/15/2022	FE	54162.00004 FedEx Charges for 08-15-22	25.03
08/15/2022	FE	54106.00002 FedEx Charges for 08-15-22	31.31
08/15/2022	PO	Postage	53.90
08/15/2022	RE	( 66 @0.10 PER PG)	6.60
08/15/2022	RE	( 66 @0.10 PER PG)	6.60

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08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	12.63
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08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00004 FedEx Charges for 08-16-22	25.03
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08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	21.54
08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	23.94



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08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	25.03
08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	44.53
08/16/2022	FE	54162.00002 FedEx Charges for 08-16-22	44.53
08/16/2022	LN	54162.00004 Lexis Charges for 08-16-22	33.69
08/16/2022	RE	( 162 @0.10 PER PG)	16.20
08/16/2022	RE	( 1620 @0.10 PER PG)	162.00
08/16/2022	RE2	SCAN/COPY ( 170 @0.10 PER PG)	17.00
08/16/2022	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
08/18/2022	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
08/18/2022	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00
08/18/2022	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
08/18/2022	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00
08/18/2022	RE2	SCAN/COPY ( 34 @0.10 PER PG)	3.40
08/18/2022	RE2	SCAN/COPY ( 34 @0.10 PER PG)	3.40
08/18/2022	RE2	SCAN/COPY ( 34 @0.10 PER PG)	3.40
08/18/2022	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00
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08/26/2022	FE	54162.00004 FedEx Charges for 08-26-22	25.03
08/26/2022	RE2	SCAN/COPY ( 441 @0.10 PER PG)	44.10
08/26/2022	TR	Transcript [E116] Veritext Legal Solutions, Inv. 6000032, KLL	436.00
08/27/2022	LN	54162.00004 Lexis Charges for 08-27-22	82.82
08/29/2022	FE	54162.00004 FedEx Charges for 08-29-22	23.65
08/29/2022	FE	54162.00004 FedEx Charges for 08-29-22	23.65
08/29/2022	FX	(AGR 28 @1.25 PER PG)	35.00
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08/29/2022	RE	( 1 @0.10 PER PG)	0.10
08/29/2022	RE	( 48 @0.10 PER PG)	4.80
08/29/2022	RE	( 72 @0.10 PER PG)	7.20
08/29/2022	RE	( 6 @0.10 PER PG)	0.60

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08/29/2022	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
08/29/2022	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
08/29/2022	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
08/30/2022	RE2	SCAN/COPY ( 22 @0.10 PER PG)	2.20
08/31/2022	OS	Everlaw, Inv. 63573, in the Madison database for the month of August	500.00

**Total Expenses for this Matter**

**\$4,027.47**

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**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 08/31/2022**

**Total Fees \$254,095.50**

**Total Expenses 4,027.47**

**Less Courtesy Discount \$55,335.50**

**Total Due on Current Invoice \$202,787.47**

**Outstanding Balance from prior invoices as of 08/31/2022 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
130635	07/31/2022	\$127,920.00	\$291.19	\$128,211.19

**Total Amount Due on Current and Prior Invoices: \$330,998.66**

**Objection Deadline: November 8, 2022**

James I. Stang (admitted *pro hac vice*)  
Iain A.W. Nasatir  
John W. Lucas  
Malhar S. Pagay (admitted *pro hac vice*)  
Gillian N. Brown  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34th Floor  
New York, NY 10017-2024  
Telephone: 212.561.7700  
Fax: 212.561.7777  
Emails: jstang@pszjlaw.com  
inasatir@pszjlaw.com  
jlucas@pszjlaw.com  
mpagay@pszjlaw.com  
gbrown@pszjlaw.com

*Counsel to the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
In re	: Chapter 11
	:
MADISON SQUARE BOYS & GIRLS CLUB, INC., <sup>1</sup>	: Case No. 22-10910-SHL
	:
Debtor.	:
	:
-----	X

**THIRD MONTHLY FEE STATEMENT OF  
PACHULSKI STANG ZIEHL & JONES LLP FOR  
COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR THE PERIOD FROM SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

<sup>1</sup>The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional:	Official Committee of Unsecured Creditors
Services to:	Official Committee of Unsecured Creditors
Date of Retention:	July 16, 2022
Period for which compensation and reimbursement is sought:	September 1, 2022 through September 30, 2022
Monthly Fees Incurred:	\$168,981.00
Fee Reduction:	(\$34,921.00) <sup>2</sup>
Fees (After Reduction):	\$134,060.00
20% Holdback:	\$26,812.00
Total Fees Less 20% Holdback:	\$107,248.00
Monthly Expenses Incurred:	\$1,599.53
Total Fees and Expenses Due:	\$108,847.53

This is a  X  monthly \_\_\_\_ interim \_\_\_\_ final application

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, the *Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to*

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<sup>2</sup> As disclosed in the Firm's employment application, the Firm is utilizing rates that are reduced from standard rates so that attorney time is capped at \$900 per hour and paralegal time is capped at \$400 per hour. The reduction set forth in this Fee Statement here accounts for the reduction from the following standard rates, as set forth in Exhibit A hereto: J. Stang (\$1,525); J. Pomerantz (\$1,445); K. Brown (\$1,395); I. Nasatir (\$1,295); M. Litvak (\$1,275); M. Pagay (\$1,095); J. Lucas (\$1,095); B. Levine (\$1,045); G. Brown (\$925); S. Golden (\$775); L. Forrester (\$495); B. Dassa (\$495); K. LaBrada (\$495); L. Canty (\$495); and M. Matteo (\$460).

*the Official Committee of Unsecured Creditors Effective as of July 16, 2022* [Docket No. 196] (the “PSZJ Retention Order”), and the *Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [Docket No. 125] (the “Interim Compensation Order”),<sup>3</sup> Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors (the “Committee”) hereby submits this third monthly fee statement (the “Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Committee in this chapter 11 case (the “Case”) during the period September 1, 2022 to September 30, 2022 (the “Fee Period”).

By this Fee Statement, PSZJ seeks payment in the amount of \$108,847.53, comprised of the following: (i) \$107,248.00, which is eighty percent (80%) of the total amount of fees incurred for actual and necessary services rendered during the Fee Period, and (ii) reimbursement of \$1,599.53, which is one hundred percent (100%) of actual and necessary expenses that PSZJ incurred in connection with its representation of the Committee during the Fee Period.

### **Services Rendered and Expenses Incurred**

1. Attached as **Exhibit A** is a summary of PSZJ’s professionals by individual, setting forth the (i) name and title of each individual who provided services in connection with this chapter 11 case during the Fee Period, (ii) the year of bar admission for each PSZJ attorney, (iii) the current, standard hourly billing rate for each individual at PSZJ working on this chapter 11 case during the Fee Period, (iv) the capped hourly rate for those individuals, and (v) the total fees that each individual billed to this Case during the Fee Period at the applicable capped billing rate. The Committee hired PSZJ on the condition that the total fees incurred would be discounted to the extent the blended rate of PSZJ attorneys does not exceed \$900.00 per hour. As provided

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<sup>3</sup> Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

in the PSZJ Retention Order, PSZJ paralegals on this Case do not exceed \$400.00 per hour. All of the PSZJ paralegals who worked on this Case during the Fee Period have standard billing rates in excess of \$400.00 per hour. PSZJ is providing a reduction in fees for the Fee Period in the amount of \$34,921.00.

2. Attached as **Exhibit B** is a summary of the services PSZJ rendered during the Fee Period and the compensation it seeks, by project category.

3. Attached as **Exhibit C** is a summary of expenses that PSZJ incurred during the Fee Period and for which it seeks reimbursement.

4. Attached as **Exhibit D** is itemized time detail of PSZJ professionals during the Fee Period and summary materials related thereto.

#### **Notice and Objection Procedures**

5. Notice of this Fee Statement shall be given by hand or overnight delivery, or by email where available, upon (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Tim McChristian); (b) Debtor's counsel: Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Andrew M. Parlen, John T. Weber, and Miriam Levi); and (c) William K. Harrington, United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz and Tara Tiantian) (the "**Notice Parties**").

6. Objections to this Fee Statement, if any, must be filed with the Court and served upon PSZJ and the other Notice Parties (set forth at para. 5, above) so as to be received no later than **fifteen (15) calendar days after filing of the Fee Statement** (the "**Objection Deadline**"),

setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

7. If no Objections to this Fee Statement are filed and served as set forth above, the Debtor shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses set forth in this Fee Statement.

8. If an Objection to this Fee Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. *See* Interim Compensation Order. To the extent such an Objection is not resolved between PSZJ and the party filing the Objection, the Objection shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: October 24, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Gillian N. Brown

James I. Stang (admitted *pro hac vice*)

Iain A.W. Nasatir

John W. Lucas

Malhar S. Pagay (admitted *pro hac vice*)

Gillian N. Brown

780 Third Avenue, 34th Floor

New York, NY 10017-2024

Telephone: 212.561.7700

Fax: 212.561.7777

Emails: jstang@pszjlaw.com

inasatir@pszjlaw.com

jluca@pszjlaw.com

mpagay@pszjlaw.com

gbrown@pszjlaw.com

*Counsel to the Official Committee of Unsecured  
Creditors*



**EXHIBIT A**

**Compensation by Professional**

**SUMMARY OF COMPENSATION BY PROFESSIONAL  
FOR SERVICES RENDERED FOR THE PERIOD  
SEPTEMBER 1, 2022 – SEPTEMBER 30, 2022**

Name of Professional Partners and Counsel	Title	Year Admitted	Standard Hourly Rate (\$)	Capped Hourly Rate in this Case (\$)	Total Billed Hours	Total Compensation at Capped Rate (\$)
James I. Stang	Partner	1980	1,525.00	900.00	14.60	\$13,140.00
Jeffrey N. Pomerantz	Partner	1989	1,445.00	900.00	0.30	\$270.00
Kenneth H. Brown	Partner	1981	1,395.00	900.00	0.30	\$270.00
Iain A.W. Nasatir	Partner	1983	1,295.00	900.00	23.60	\$21,240.00
Maxim B. Litvak	Partner	1997	1,275.00	900.00	11.40	\$10,260.00
Malhar S. Pagay	Partner	1997	1,095.00	900.00	6.10	\$5,490.00
John W. Lucas	Partner	2005	1,095.00	900.00	34.20	\$30,780.00
Beth E. Levine	Counsel	1993	1,045.00	900.00	0.70	\$630.00
Gillian N. Brown	Counsel	1999	925.00	900.00	42.80	\$38,520.00
Steven W. Golden	Counsel	2015	775.00	N/A	0.80	\$620.00
<b>Total Partners and Counsel:</b>					<b>134.80</b>	<b>\$121,220.00</b>

Name of Paralegals and Other Non-Legal Staff	Standard Hourly Billing Rate (\$)	Capped Hourly Rate in this Case (\$)	Total Billed Hours	Total Compensation at Capped Rate (\$)
Leslie A. Forrester	495.00	400.00	0.5	\$200.00
Beth D. Dassa	495.00	400.00	25.	\$10,240.00
Kerri L. LaBrada	495.00	400.00	0.4	\$160.00
La Asia S. Canty	495.00	400.00	0.1	\$40.00
Michael A. Matteo	460.00	400.00	5.5	\$2,200.00
<b>Total Paralegals and Other Non-Legal Staff:</b>			<b>32.10</b>	<b>\$12,840.00</b>

ALL PROFESSIONALS	DISCOUNTED/CAPPED BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Attorneys	899.26 <sup>4</sup>	134.80	\$121,220.00
Paralegals, Non-Legal Staff	400.00	32.10	\$12,840.00
<b>Total Hours and Fees Incurred</b>		<b>166.90</b>	<b>\$134,060.00</b>

<sup>4</sup> The total blended rate PSZJ attorneys is less than the \$900 capped rate because one associate attorney who worked on the Case during the Fee Period bills at a standard rate below \$900.

**EXHIBIT B**

**Compensation by Task Code**

**AGGREGATE TIME SUMMARY BY TASK CODE  
FOR THE PERIOD SEPTEMBER 1, 2022 – SEPTEMBER 30, 2022**

<b>Task Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees (\$)</b>
AP	Appeals	0.40	\$490.00
BL	Bankruptcy Litigation	57.70	\$50,624.00
CA	Case Administration	2.90	\$1,435.50
CO	Claims Admin/Objections	3.30	\$3,596.50
CP	Compensation of Professionals	7.90	\$4,850.50
CPO	Compensation of Professionals/Other	0.60	\$426.00
FN	Financing	24.50	\$29,641.50
GC	General Creditors Committee	32.90	\$36,809.50
IC	Insurance Coverage	13.10	\$11,986.50
ME	Mediation	19.30	\$24,778.50
RPO	Retention of Professionals/Other	4.30	\$4,342.50
	<b>TOTAL</b>	<b>166.90</b>	<b>\$168,981.00 (less discount, for total of \$134,060.00)</b>

**EXHIBIT C**

**Expense Summary**

**AGGREGATE ITEMIZED EXPENSES FOR THE PERIOD  
SEPTEMBER 1, 2022 – SEPTEMBER 30, 2022**

<b>Expenses Category</b>	<b>Total Expenses (\$)</b>
Air Fare	\$450.00
Federal Express	\$118.40
Lexis/Nexis Legal Research	\$494.23
Outside Services	\$500.00
Reproduction Expense	\$19.60
Reproduction/Scan Copy	\$17.30
<b>TOTAL</b>	<b>\$1,599.53</b>

**EXHIBIT D**

**Itemized Time Detail for the Fee Period**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

September 30, 2022

Invoice 131034

Client 54162

Matter 00004

**GNB**

GNB

RE: Committee Representaton

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 09/30/2022**

FEES	\$168,981.00
EXPENSES	\$1,599.53
LESS COURTESY DISCOUNT	\$34,921.00
<b>TOTAL CURRENT CHARGES</b>	<b>\$135,659.53</b>
<b>BALANCE FORWARD</b>	<b>\$330,998.66</b>
<b>TOTAL BALANCE DUE</b>	<b>\$466,658.19</b>



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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BDD	Dassa, Beth D.	Paralegal	495.00	25.60	\$12,672.00
BEL	Levine, Beth E.	Counsel	1045.00	0.70	\$731.50
GNB	Brown, Gillian N.	Counsel	925.00	42.80	\$39,590.00
IAWN	Nasatir, Iain A. W.	Partner	1295.00	23.60	\$30,562.00
JIS	Stang, James I.	Partner	1525.00	14.60	\$22,265.00
JNP	Pomerantz, Jeffrey N.	Partner	1445.00	0.30	\$433.50
JWL	Lucas, John W.	Partner	1095.00	34.20	\$37,449.00
KHB	Brown, Kenneth H.	Partner	1395.00	0.30	\$418.50
KLL	LaBrada, Kerri L.	Paralegal	495.00	0.40	\$198.00
LAF	Forrester, Leslie A.	Other	495.00	0.50	\$247.50
LSC	Canty, La Asia S.	Paralegal	495.00	0.10	\$49.50
MAM	Matteo, Mike A.	Paralegal	460.00	5.50	\$2,530.00
MBL	Litvak, Maxim B.	Partner	1275.00	11.40	\$14,535.00
MSP	Pagay, Malhar S.	Partner	1095.00	6.10	\$6,679.50
SWG	Golden, Steven W.	Associate	775.00	0.80	\$620.00
				166.90	\$168,981.00

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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AP	Appeals [B430]	0.40	\$490.00
BL	Bankruptcy Litigation [L430]	57.70	\$50,624.00
CA	Case Administration [B110]	2.90	\$1,435.50
CO	Claims Admin/Objections[B310]	3.30	\$3,596.50
CP	Compensation Prof. [B160]	7.90	\$4,850.50
CPO	Comp. of Prof./Others	0.60	\$426.00
FN	Financing [B230]	24.50	\$29,641.50
GC	General Creditors Comm. [B150]	32.90	\$36,809.50
IC	Insurance Coverage	13.10	\$11,986.50
ME	Mediation	19.30	\$24,778.50
RPO	Ret. of Prof./Other	4.30	\$4,342.50
		166.90	<hr/> \$168,981.00

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**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$450.00
Federal Express [E108]	\$118.40
Lexis/Nexis- Legal Research [E	\$494.23
Outside Services	\$500.00
Reproduction Expense [E101]	\$19.60
Reproduction/ Scan Copy	\$17.30
	<hr/>
	\$1,599.53

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Appeals [B430]</b>						
09/01/2022	GNB	AP	Email with John W. Lucas regarding Xclaim appeal.	0.10	925.00	\$92.50
09/02/2022	JIS	AP	Call M. Dundon re appeal related to claims agent.	0.20	1525.00	\$305.00
09/09/2022	GNB	AP	Review today's notice of X-Claim's status conference on Monday morning; Email with James I. Stang and John W. Lucas regarding same.	0.10	925.00	\$92.50
				<b>0.40</b>		<b>\$490.00</b>
<b>Bankruptcy Litigation [L430]</b>						
09/01/2022	GNB	BL	Email and telephone conference with Iain A.W. Nasatir regarding Rule 2004 motion directed to insurers.	0.10	925.00	\$92.50
09/01/2022	GNB	BL	Email Michael Williams regarding status of review of order on Rule 2004 motion directed to BGCA.	0.10	925.00	\$92.50
09/01/2022	GNB	BL	Revise and edit Amended CNO re Rule 2004 motion as to non-objecting insurers.	0.30	925.00	\$277.50
09/01/2022	IAWN	BL	Revise and edit G. Brown documents	1.40	1295.00	\$1,813.00
09/01/2022	IAWN	BL	Exchange emails and telephone calls with Gregg Galardi regarding discovery	0.30	1295.00	\$388.50
09/01/2022	IAWN	BL	Forward Rule 2004 documents to Galardi with comments	0.10	1295.00	\$129.50
09/01/2022	IAWN	BL	Email with G. Brown regarding edits to Rule 2004 order	0.10	1295.00	\$129.50
09/02/2022	GNB	BL	Revise and edit CNO re motion at docket no. 109.	0.20	925.00	\$185.00
09/02/2022	GNB	BL	Revise order on docket re motion at no. 109.	0.20	925.00	\$185.00
09/02/2022	GNB	BL	Draft email to Chambers regarding resolution of Rule 2004 motion directed to BGCA and proposed order thereon.	0.40	925.00	\$370.00
09/02/2022	IAWN	BL	Exchange emails with Galardi regarding discovery	0.10	1295.00	\$129.50
09/04/2022	GNB	BL	Review production log of documents produced to PSZJ; Email Patricia J. Jeffries, Kerri L. LaBrada, and Beth D. Dassa regarding edits to same.	0.10	925.00	\$92.50
09/05/2022	GNB	BL	Email with Iain A.W. Nasatir regarding edits to proposed Rule 2004 order relating to Rockefeller University; Review emails from Gregg Galardi	0.10	925.00	\$92.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			respecting same.			
09/05/2022	IAWN	BL	Revise definition of RU	0.10	1295.00	\$129.50
09/05/2022	IAWN	BL	Exchange emails with Galardi regarding definition	0.10	1295.00	\$129.50
09/05/2022	IAWN	BL	Exchange emails with G. Brown and Galardi regarding discovery	0.30	1295.00	\$388.50
09/06/2022	GNB	BL	Review and edit Gregg Galardi's draft Rule 2004 stipulation and order respecting Rockefeller University [Docket No. 111] (.4); Email with Iain A.W. Nasatir regarding same (.1).	0.50	925.00	\$462.50
09/06/2022	IAWN	BL	Exchange emails with Galardi, debtor and G. Brown regarding discovery	0.30	1295.00	\$388.50
09/06/2022	MSP	BL	Email with John W. Lucas re: case and litigation strategy.	0.30	1095.00	\$328.50
09/07/2022	GNB	BL	Continue edits to Gregg Galardi's draft Rule 2004 stipulation and order respecting Rockefeller University [Docket No. 111] (.1); Telephone conference with Iain A.W. Nasatir regarding same (.1); Revise proposed order on Rule 2004 motion directed to insurers (2.4); Telephone conference with Iain A.W. Nasatir regarding same (.2).	2.80	925.00	\$2,590.00
09/07/2022	IAWN	BL	Exchange emails with G. Brown regarding discovery	0.10	1295.00	\$129.50
09/07/2022	IAWN	BL	Telephone conference with G. Brown regarding discovery	0.20	1295.00	\$259.00
09/07/2022	IAWN	BL	Review emails between Galardi and G. Brown regarding discovery	0.20	1295.00	\$259.00
09/08/2022	GNB	BL	Telephone conference with Tabish Rizvi and Steven Landgraber (partial attendance) regarding areas for inquiry of Teneo and financial documents produced this morning.	0.60	925.00	\$555.00
09/08/2022	GNB	BL	Email with Gregg Galardi regarding proposed order and stipulation resolving Rule 2004 motion with regard to Rockefeller entities.	0.10	925.00	\$92.50
09/08/2022	GNB	BL	Email with Iain A.W. Nasatir regarding proposed order and stipulation resolving Rule 2004 motion with regard to Rockefeller entities.	0.20	925.00	\$185.00
09/08/2022	GNB	BL	Revise proposed order on Rule 2004 motion directed to insurers (including Exhibits thereto).	0.30	925.00	\$277.50
09/08/2022	GNB	BL	Email with Malhar S. Pagay regarding informal	0.10	925.00	\$92.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			discovery requests to Debtor and Lauren Varga email from last week regarding same.			
09/08/2022	IAWN	BL	Review G. Brown and Galardi emails regarding discovery	0.30	1295.00	\$388.50
09/08/2022	IAWN	BL	Exchange emails with G. Brown regarding discovery	0.10	1295.00	\$129.50
09/08/2022	MSP	BL	Email exchange with Gillian N. Brown re: discovery status.	0.10	1095.00	\$109.50
09/09/2022	GNB	BL	Further revise proposed order and stipulation with Rockefeller entities.	0.40	925.00	\$370.00
09/09/2022	GNB	BL	Further revise proposed Rule 2004 order pertaining to insurers.	0.60	925.00	\$555.00
09/09/2022	IAWN	BL	Review Miller and G. Brown emails regarding discovery	0.10	1295.00	\$129.50
09/10/2022	GNB	BL	Email Gregg Galardi, Crowell counsel, and Debtor's counsel with revised draft papers resolving Rule 2004 motion directed to insurers; Email with Iain A.W. Nasatir regarding same.	0.10	925.00	\$92.50
09/10/2022	IAWN	BL	Review Galardi and G. Brown emails regarding discovery	0.10	1295.00	\$129.50
09/12/2022	BDD	BL	Work on production log re documents produced to Everlaw.	1.10	495.00	\$544.50
09/13/2022	GNB	BL	Revise Michael A. Matteo spreadsheet relating to Rule 2004 subpoenas.	0.10	925.00	\$92.50
09/13/2022	GNB	BL	Revise and edit Rule 2004 subpoena to BGCA.	0.20	925.00	\$185.00
09/13/2022	GNB	BL	Prepare Exhibit 1 to Rule 2004 subpoena to BGCA.	0.20	925.00	\$185.00
09/13/2022	GNB	BL	Telephone conference with Miriam Levi regarding Rule 2004 orders.	0.20	925.00	\$185.00
09/13/2022	GNB	BL	Telephone conference with La Asia Canty regarding subpoenas.	0.10	925.00	\$92.50
09/13/2022	GNB	BL	Email Mike Williams with service of subpoena directed to BGCA; Update tracking chart regarding same; Email Beth D. Dassa and Michael A. Matteo regarding same.	0.10	925.00	\$92.50
09/13/2022	MAM	BL	Create virtual folder for Rule 2004 Subpoenas.	0.10	460.00	\$46.00
09/13/2022	MAM	BL	Draft and forward subpoena to Boys & Girls Clubs of America to Gillian N. Brown.	0.50	460.00	\$230.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/13/2022	MAM	BL	Draft and forward Rule 2004 subpoena to Boys & Girls Clubs of America to Gillian N. Brown.	0.40	460.00	\$184.00
09/13/2022	BDD	BL	Update production log and email G. Brown re same.	0.20	495.00	\$99.00
09/13/2022	BDD	BL	Email G. Brown re Rule 2004 subpoena (PSZJ production request to BGCA).	0.10	495.00	\$49.50
09/13/2022	LSC	BL	Telephone conference with G. Brown re 2004 motion.	0.10	495.00	\$49.50
09/14/2022	GNB	BL	Email with Gregg Galardi regarding finalizing Rule 2004 order; Email with PSZJ group regarding same; Review Amit Roitman email regarding Rockefeller insurers.	0.10	925.00	\$92.50
09/14/2022	GNB	BL	Email with Mike Williams regarding BGCA's completed document production; Update subpoena status chart in conjunction with same; Email with PSZJ team regarding scheduling for calls.	0.10	925.00	\$92.50
09/14/2022	IAWN	BL	Review G. Brown, J. Lucas and Galardi emails regarding discovery and respond to same	0.80	1295.00	\$1,036.00
09/14/2022	KLL	BL	Correspond with G. Brown on confirmation of datasite documents uploaded to Everlaw.	0.20	495.00	\$99.00
09/15/2022	GNB	BL	Telephone conference with Gregg Galardi regarding proposed order on Rule 2004 motion directed to insurers and stipulation with Rockefeller entities.	0.30	925.00	\$277.50
09/15/2022	GNB	BL	Telephone conference with Iain A.W. Nasatir regarding Gregg Galardi edits to proposed order on Rule 2004 motion directed to insurers and stipulation with Rockefeller entities.	0.20	925.00	\$185.00
09/15/2022	GNB	BL	Email with Malhar S. Pagay regarding Rule 2004 order relating to insurers; Brief phone call with James I. Stang regarding same.	0.10	925.00	\$92.50
09/15/2022	IAWN	BL	Telephone conference with G. Brown regarding discovery	0.20	1295.00	\$259.00
09/15/2022	IAWN	BL	Review M. Pagay, G. Brown and J. Lucas emails regarding Galardi and discovery	0.20	1295.00	\$259.00
09/15/2022	IAWN	BL	Exchange emails with G. Brown regarding Galardi position	0.10	1295.00	\$129.50
09/15/2022	MSP	BL	Email exchange with Gillian N. Brown re: Status of Rule 2004 matters.	0.20	1095.00	\$219.00
09/16/2022	GNB	BL	Revise and edit proposed orders on Rule 2004	0.70	925.00	\$647.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			motion.			
09/16/2022	GNB	BL	Revise and edit stipulation with Rockefeller entities.	0.60	925.00	\$555.00
09/16/2022	GNB	BL	Email PSZJ team regarding proposed orders relating to insurance discovery.	0.10	925.00	\$92.50
09/16/2022	GNB	BL	Email with and telephone conference with staff regarding organization of Debtor's documents for substantive review.	0.10	925.00	\$92.50
09/16/2022	BDD	BL	Email G. Brown re documents for inclusion in Everlaw.	0.10	495.00	\$49.50
09/16/2022	BDD	BL	Email D. Spellman at Paul Weiss re Fileshare documents.	0.10	495.00	\$49.50
09/17/2022	IAWN	BL	Exchange emails with G. Brown regarding subpoena	0.10	1295.00	\$129.50
09/17/2022	IAWN	BL	Review order/subpoena and related documents	0.70	1295.00	\$906.50
09/17/2022	IAWN	BL	Exchange emails with M. Pagay regarding subpoenas	0.10	1295.00	\$129.50
09/17/2022	IAWN	BL	Review G. Brown and Plevin emails re Rule 2004	0.10	1295.00	\$129.50
09/17/2022	IAWN	BL	Exchange emails with G. Brown regarding Rule 2004 discovery	0.10	1295.00	\$129.50
09/19/2022	GNB	BL	Revise and circulate to opposing counsel proposed orders relating to insurance document productions.	1.20	925.00	\$1,110.00
09/19/2022	GNB	BL	Email with Mark Plevin regarding proposed order relating to non-Rockefeller Insurers.	0.10	925.00	\$92.50
09/19/2022	GNB	BL	Email with Patricia J. Jeffries regarding insurer representations relating to service of Rule 2004 orders.	0.10	925.00	\$92.50
09/19/2022	GNB	BL	Email Beth D. Dassa regarding additional documents to process and upload to Everlaw from BGCA.	0.10	925.00	\$92.50
09/19/2022	GNB	BL	Email with Gregg Galardi regarding Rule 2004 proposed orders and email with Malhar S. Pagay regarding same.	0.20	925.00	\$185.00
09/19/2022	BDD	BL	Prepare documents for inclusion in Everlaw and email G. Brown and M. Cano re same.	0.20	495.00	\$99.00
09/19/2022	BDD	BL	Upload documents received from Paul Weiss and Hurwitz Fine to Everlaw and email G. Brown re same.	3.80	495.00	\$1,881.00



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/20/2022	GNB	BL	Email Iain A.W. Nasatir and Malhar S. Pagay regarding Gregg Galardi edits to proposed order on Rule 2004 motion.	0.10	925.00	\$92.50
09/20/2022	GNB	BL	Telephone conferences with Malhar S. Pagay regarding Gregg Galardi edits to proposed Rule 2004 order.	0.30	925.00	\$277.50
09/20/2022	IAWN	BL	Review discovery subpoena order and comment regarding same	0.30	1295.00	\$388.50
09/20/2022	IAWN	BL	Review emails between M. Pagay, G. Brown and Galardi regarding subpoena	0.10	1295.00	\$129.50
09/20/2022	MSP	BL	Telephone calls (3: .20; .10; .10) with Gillian N. Brown re: status of insurer discovery.	0.30	1095.00	\$328.50
09/20/2022	MSP	BL	Review and revise proposed order re: insurer Rule 2004 motion.	0.90	1095.00	\$985.50
09/20/2022	MSP	BL	Email Iain Nasatir re: status of insurer discovery.	0.20	1095.00	\$219.00
09/20/2022	MSP	BL	Follow up with James I. Stang re: status of insurer discovery.	0.20	1095.00	\$219.00
09/20/2022	BDD	BL	Upload additional Paul Weiss documents to Everlaw and confer with Everlaw re same.	0.40	495.00	\$198.00
09/20/2022	BDD	BL	Locate and email M. Pagay re 8/31 hearing transcript.	0.10	495.00	\$49.50
09/21/2022	GNB	BL	Revise and edit proposed orders resolving Rule 2004 motion at Docket No. 111.	3.80	925.00	\$3,515.00
09/21/2022	GNB	BL	Edit Sophia Lee certificate of service relating to Docket No. 209.	0.10	925.00	\$92.50
09/21/2022	GNB	BL	Email PSZJ team regarding email from Jennifer Freeman concerning insurance.	0.10	925.00	\$92.50
09/21/2022	IAWN	BL	Exchange emails with J. Lucas, G. Brown and M. Pagay regarding discovery	0.10	1295.00	\$129.50
09/21/2022	IAWN	BL	Exchange emails regarding Plevin with G. Brown and M. Pagay	0.10	1295.00	\$129.50
09/21/2022	IAWN	BL	Exchange emails with M. Pagay and G. Brown regarding email to chambers	0.10	1295.00	\$129.50
09/21/2022	IAWN	BL	Further review of discovery documents	0.20	1295.00	\$259.00
09/21/2022	IAWN	BL	Exchange emails with M. Pagay regarding Plevin	0.10	1295.00	\$129.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/21/2022	IAWN	BL	Exchange emails with G. Brown regarding parties to be removed from service list	0.10	1295.00	\$129.50
09/21/2022	IAWN	BL	Review M. Pagay and G. Brown emails regarding service of subpoenas.	0.10	1295.00	\$129.50
09/21/2022	IAWN	BL	Exchange emails with G. Brown and M. Pagay regarding service and additional paragraph in Rule 2004 order	0.10	1295.00	\$129.50
09/21/2022	IAWN	BL	Exchange emails with G. Brown and M. Pagay regarding primary v. named insured	0.10	1295.00	\$129.50
09/21/2022	IAWN	BL	Review state court counsel emails regarding subpoena.	0.10	1295.00	\$129.50
09/21/2022	JIS	BL	Review email regarding 1956 insurance evidence.	0.20	1525.00	\$305.00
09/21/2022	MSP	BL	Review and revise proposed order re: insurer Rule 2004 motion.	0.20	1095.00	\$219.00
09/21/2022	MSP	BL	Email Gillian N. Brown re: insurer discovery.	0.30	1095.00	\$328.50
09/21/2022	MSP	BL	Email Iain Nasatir re: insurer discovery.	0.10	1095.00	\$109.50
09/21/2022	BEL	BL	Review local rule regarding settlement of orders and email Gillian N. Brown regarding procedures.	0.40	1045.00	\$418.00
09/21/2022	BDD	BL	Upload additional Paul Weiss documents into Everlaw.	0.30	495.00	\$148.50
09/22/2022	GNB	BL	Email with Malhar S. Pagay over course of the day regarding Rule 2004 discovery.	0.80	925.00	\$740.00
09/22/2022	GNB	BL	Revise and edit Rule 2004 orders.	2.90	925.00	\$2,682.50
09/22/2022	GNB	BL	Email with Beth E. Levine regarding Rule 2004 order procedures.	0.10	925.00	\$92.50
09/22/2022	GNB	BL	Email Beth D. Dassa regarding agents for service of process of Rule 2004 subpoenas.	0.20	925.00	\$185.00
09/22/2022	GNB	BL	Revise and edit emails to Chambers (.4) and to opposing counsel regarding proposed orders on Rule 2004 motion (.6).	1.00	925.00	\$925.00
09/22/2022	GNB	BL	Email Beth E. Levine regarding Rule 2004 order.	0.10	925.00	\$92.50
09/22/2022	IAWN	BL	Exchange emails with G. Brown regarding new documents in data room	0.10	1295.00	\$129.50
09/22/2022	MSP	BL	Review and revise proposed orders re: insurer Rule 2004 motion.	1.00	1095.00	\$1,095.00

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09/22/2022	MSP	BL	Email Gillian N. Brown re: insurer discovery.	0.30	1095.00	\$328.50
09/22/2022	MSP	BL	Follow up with Iain Nasatir re: insurer discovery.	0.10	1095.00	\$109.50
09/22/2022	BEL	BL	Telephone conference with Gillian N. Brown regarding procedural issues.	0.10	1045.00	\$104.50
09/22/2022	BEL	BL	Emails to Gillian N. Brown regarding proposed order procedural issues.	0.20	1045.00	\$209.00
09/23/2022	GNB	BL	Telephonic meet and confer with Iain A.W. Nasatir, Gregg Galardi, Natasha Romangnoli, and Amit Roitman regarding Rule 2004 motion to insurers and stipulation with Rockefeller.	0.40	925.00	\$370.00
09/23/2022	GNB	BL	Telephone conference with Iain A.W. Nasatir following call with Rockefeller counsel.	0.10	925.00	\$92.50
09/23/2022	GNB	BL	Revise Rule 2004 stipulation and order with Rockefeller.	0.20	925.00	\$185.00
09/23/2022	GNB	BL	Revise Rule 2004 proposed order re Rule 2004 motion to non-Rockefeller insurers.	0.30	925.00	\$277.50
09/23/2022	GNB	BL	Email PSZJ team regarding status of Rule 2004 proposed orders.	0.10	925.00	\$92.50
09/23/2022	GNB	BL	Telephone conference with James I. Stang and Malhar S. Pagay (partial) regarding status of several discovery issues.	0.40	925.00	\$370.00
09/23/2022	JIS	BL	Call G. Brown and M. Pagay (partial) regarding insurance discovery orders.	0.40	1525.00	\$610.00
09/23/2022	MSP	BL	Telephone conference with James I. Stang, Gillian N. Brown re: status of insurance production, etc.	0.30	1095.00	\$328.50
09/24/2022	GNB	BL	Review emails from Jennifer Freeman regarding insurance; Email with Iain A.W. Nasatir regarding same.	0.10	925.00	\$92.50
09/24/2022	BDD	BL	Research agents for service of process for subpoenas re Rule 2004 motion (2.80); emails I. Nasatir, G. Brown and L. Forrester re same (.20)	3.00	495.00	\$1,485.00
09/25/2022	GNB	BL	Finalize stipulation and order for Gregg Galardi.	0.20	925.00	\$185.00
09/25/2022	GNB	BL	Revise proposed order relating to non-Rockefeller insurers (.1); Email Iain A.W. Nasatir regarding same (.1); Email Mark Plevin regarding same (.2).	0.40	925.00	\$370.00
09/26/2022	BDD	BL	Email L. Forrester re registered agent information.	0.10	495.00	\$49.50

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09/27/2022	GNB	BL	Email with Geoffrey Miller at Dentons regarding proposed order pertaining to Rule 2004 motion as to non-Rockefeller insurers.	0.10	925.00	\$92.50
09/27/2022	GNB	BL	Review email from Gregg Galardi regarding edits to stipulation and order with Rockefeller; Email Iain A.W. Nasatir and Malhar S. Pagay regarding status of Rule 2004 orders.	0.10	925.00	\$92.50
09/27/2022	IAWN	BL	Review G. Brown email re orders	0.10	1295.00	\$129.50
09/28/2022	GNB	BL	Email with Gregg Galardi regarding draft stipulation on Rule 2004 insurance issues; Voicemail and email to Mark Plevin regarding proposed Rule 2004 order.	0.10	925.00	\$92.50
09/28/2022	GNB	BL	Review emails between Iain A.W. Nasatir and Jason Amala regarding insurance; Review email from Miriam Levi regarding Covington Report; Email with James I. Stang regarding same.	0.10	925.00	\$92.50
09/28/2022	IAWN	BL	Exchange emails with Amala re insurance	0.20	1295.00	\$259.00
09/28/2022	IAWN	BL	Review and respond to G. Brown emails re discovery	0.20	1295.00	\$259.00
09/28/2022	IAWN	BL	Review J. Lucas email with AIG discussion	0.10	1295.00	\$129.50
09/28/2022	BDD	BL	Email G. Brown re registered agent for Arrowood.	0.10	495.00	\$49.50
09/29/2022	GNB	BL	Draft email to Chambers regarding hearing date for Rule 2004 motion; Email with John W. Lucas regarding same.	0.10	925.00	\$92.50
09/29/2022	GNB	BL	Email counsel for non-Rockefeller objecting parties regarding proposed order.	0.10	925.00	\$92.50
09/29/2022	GNB	BL	Telephone conference with Michael A. Matteo regarding service of subpoenas pursuant to order at Docket No. 220 to non-objecting insurers on Rule 2004 motion.	0.10	925.00	\$92.50
09/29/2022	GNB	BL	Email with Beth D. Dassa and Michael A. Matteo regarding service of subpoenas pursuant to order at Docket No. 220 to non-objecting insurers on Rule 2004 motion.	0.10	925.00	\$92.50
09/29/2022	GNB	BL	Draft letter to registered agents to accompany subpoenas pursuant to order at Docket No. 220 to non-objecting insurers on Rule 2004 motion.	0.10	925.00	\$92.50
09/29/2022	GNB	BL	Prepare Exhibit A to subpoenas on non-objecting insurers on Rule 2004 motion.	0.20	925.00	\$185.00

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09/29/2022	GNB	BL	Email with Michael A. Matteo regarding subpoena packages and instructions for service.	0.50	925.00	\$462.50
09/29/2022	GNB	BL	Email with Iain A.W. Nasatir and Michael A. Matteo regarding subpoena service.	0.10	925.00	\$92.50
09/29/2022	IAWN	BL	Exchange emails with G. Brown and M. Matteo re service of subpoenas	0.10	1295.00	\$129.50
09/29/2022	IAWN	BL	Exchange emails with J. Lucas and debtor re renewals of insurance	0.30	1295.00	\$388.50
09/29/2022	MAM	BL	Telephone call with Gillian N. Brown regarding insurance companies to subpoena.	0.10	460.00	\$46.00
09/29/2022	MAM	BL	Draft and forward subpoena versus Magna Carta Companies, Inc.	0.30	460.00	\$138.00
09/29/2022	MAM	BL	Draft and forward subpoena versus Public Service Mutual Insurance Company.	0.30	460.00	\$138.00
09/29/2022	MAM	BL	Draft and forward subpoena versus General Star Indemnity Company.	0.30	460.00	\$138.00
09/29/2022	MAM	BL	Draft and forward subpoena versus AG Risk Management Inc.	0.30	460.00	\$138.00
09/29/2022	MAM	BL	Draft and forward subpoena versus Argonaut Insurance Company	0.30	460.00	\$138.00
09/29/2022	MAM	BL	Update subpoena tracking chart with service information.	0.30	460.00	\$138.00
09/29/2022	MAM	BL	Global changes to subpoenas regarding exhibit A.	0.10	460.00	\$46.00
09/29/2022	MAM	BL	Email to Janice Washington regarding instructions for service of subpoenas.	0.20	460.00	\$92.00
09/29/2022	MAM	BL	Telephone call with Iain Nasatir regarding second tranche of subpoenas service status.	0.10	460.00	\$46.00
09/29/2022	MAM	BL	Update virtual files regarding 2004 subpoenas for the second tranche.	0.40	460.00	\$184.00
09/29/2022	MAM	BL	Email to US Trustee and others regarding 2004 subpoenas in the second tranche.	0.30	460.00	\$138.00
09/29/2022	MAM	BL	Draft and forward subpoena versus Church Mutual Insurance Company, S.I.	0.30	460.00	\$138.00
09/29/2022	MAM	BL	Draft email to Gillian N. Brown regarding subpoena parties with no registered agents.	0.10	460.00	\$46.00

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09/29/2022	BDD	BL	Email G. Brown re Rule 2004 subpoenas.	0.10	495.00	\$49.50
09/29/2022	BDD	BL	Research registered agent information for Arrowood and emails G. Brown and M. Matteo re same.	0.30	495.00	\$148.50
09/29/2022	BDD	BL	Email M. Matteo re Magna Carta registered agent.	0.10	495.00	\$49.50
09/30/2022	GNB	BL	Telephone conference with Mark Plevin regarding proposed order on Rule 2004 motion as to non-Rockefeller insurers.	0.40	925.00	\$370.00
09/30/2022	GNB	BL	Email with Nora Valenza-Frost at Carlton Fields regarding proposed order on Rule 2004 motion as to non-Rockefeller insurers.	0.10	925.00	\$92.50
09/30/2022	GNB	BL	Email with Liza Ebanks (in Chambers) re October 13 hearing date for Rule 2004 motion if needed; Email Iain A.W. Nasatir regarding same.	0.10	925.00	\$92.50
09/30/2022	GNB	BL	Email with Michael A. Matteo regarding subpoena to A.G. Risk.	0.20	925.00	\$185.00
09/30/2022	GNB	BL	Email with Geoff Miller at Dentons regarding edit to proposed order on Rule 2004 motion as to non-Rockefeller insurers; Revise proposed order in accordance therewith and per discussion with Mark Plevin.	0.10	925.00	\$92.50
09/30/2022	IAWN	BL	Exchange emails with G. Brown re attending hearing	0.10	1295.00	\$129.50
09/30/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding status of AG Risk Management service of subpoena.	0.10	460.00	\$46.00
09/30/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding status of Magna Carta Insurance service of subpoena.	0.10	460.00	\$46.00
09/30/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding status of General Star Indemnity Insurance service of subpoena.	0.10	460.00	\$46.00
09/30/2022	MAM	BL	Research for Gillian N. Brown regarding AG Risk Management process address.	0.40	460.00	\$184.00
09/30/2022	MAM	BL	Draft alternate 2004 subpoena for A.G. Risk Management Inc.	0.20	460.00	\$92.00
09/30/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding service status of 2004 subpoena to Argonaut Insurance.	0.10	460.00	\$46.00

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09/30/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding service status of 2004 subpoena to Church Mutual.	0.10	460.00	\$46.00
09/30/2022	LAF	BL	Obtain corporate documents for A.G. Risk from secretary of state.	0.50	495.00	\$247.50
09/30/2022	BDD	BL	Email M. Matteo re subpoenas for non objecting insurers.	0.10	495.00	\$49.50
				<b>57.70</b>		<b>\$50,624.00</b>

### Case Administration [B110]

09/02/2022	KLL	CA	Update critical dates memo.	0.20	495.00	\$99.00
09/06/2022	BDD	CA	Review critical dates calendaring and email G. Brown re same.	0.40	495.00	\$198.00
09/07/2022	BDD	CA	Attend to calendaring matters with B. Anavim and M. Kulick	0.20	495.00	\$99.00
09/13/2022	BDD	CA	Attend to calendaring matters with B. Anavim and M. Kulick.	0.20	495.00	\$99.00
09/16/2022	BDD	CA	Attend to critical dates and calendaring matters and emails G. Brown re same.	0.30	495.00	\$148.50
09/19/2022	BDD	CA	Review various service lists on Epiq and court websites and emails G. Brown and S. Lee re same.	0.40	495.00	\$198.00
09/19/2022	BDD	CA	Email Epiq re service lists.	0.10	495.00	\$49.50
09/20/2022	BDD	CA	Review issues with service lists including conferring with Epiq team and G. Brown.	0.40	495.00	\$198.00
09/20/2022	BDD	CA	Review local rules re filing deadlines and emails G. Brown re same.	0.10	495.00	\$49.50
09/21/2022	BDD	CA	Attend to calendaring matters with M. Kulick and B. Anavim.	0.20	495.00	\$99.00
09/22/2022	BDD	CA	Attend to calendaring matters with M. Kulick and B. Anavim.	0.10	495.00	\$49.50
09/26/2022	BDD	CA	Email G. Brown re calendaring matters.	0.10	495.00	\$49.50
09/28/2022	BDD	CA	Attend to calendaring matters with B. Anavim and M. Kulick.	0.10	495.00	\$49.50
09/29/2022	BDD	CA	Attend to calendaring matters with B. Anavim and M. Kulick	0.10	495.00	\$49.50

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**2.90** **\$1,435.50**

**Claims Admin/Objections[B310]**

09/06/2022	GNB	CO	Email with John W. Lucas regarding Debtor's proposed bar date notification.	0.10	925.00	\$92.50
09/06/2022	JWL	CO	Review proposed publication notice and internet banners and send to committee chairs for review.	0.50	1095.00	\$547.50
09/07/2022	JWL	CO	Research asset restriction issues and payment of creditor claims.	2.70	1095.00	\$2,956.50
				<b>3.30</b>		<b>\$3,596.50</b>

**Compensation Prof. [B160]**

09/02/2022	GNB	CP	Prepare July 2022 monthly fee statement for PSZJ.	0.10	925.00	\$92.50
09/02/2022	GNB	CP	Read order regarding professionals' fees (Docket No. 125).	0.10	925.00	\$92.50
09/03/2022	GNB	CP	Revise and edit PSZJ July 2022 monthly fee notice.	0.60	925.00	\$555.00
09/06/2022	GNB	CP	Telephone conferences with Beth D. Dassa regarding PSZJ's first fee statement, PSZJ's bill and reductions, and local rules pertaining to same.	0.20	925.00	\$185.00
09/06/2022	BDD	CP	Call with G. Brown re PSZJ 1st monthly fee application.	0.20	495.00	\$99.00
09/06/2022	BDD	CP	Prepare PSZJ 1st monthly fee statement and multiple emails with G. Brown re same.	1.70	495.00	\$841.50
09/07/2022	BDD	CP	Email G. Brown re PSZJ 1st monthly fee statement.	0.10	495.00	\$49.50
09/13/2022	GNB	CP	Email with Beth D. Dassa regarding monthly fee applications for July and August 2022.	0.10	925.00	\$92.50
09/13/2022	BDD	CP	Email G. Brown re PSZJ Aug monthly fee statement.	0.10	495.00	\$49.50
09/14/2022	GNB	CP	Revise and edit PSZJ's first monthly fee statement for July 2022.	0.50	925.00	\$462.50
09/14/2022	BDD	CP	Email G. Brown re service of monthly fee statements.	0.10	495.00	\$49.50
09/15/2022	GNB	CP	Revise PSZJ first monthly fee statement; Email with John W. Lucas, Beth D. Dassa, and Raella Rothman regarding same.	0.10	925.00	\$92.50
09/15/2022	BDD	CP	Email G. Brown re PSZJ July monthly fee statement.	0.10	495.00	\$49.50



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09/15/2022	BDD	CP	Email G. Brown re PSZJ Aug monthly fee statement.	0.10	495.00	\$49.50
09/16/2022	BDD	CP	Review presentment procedures and prepare draft email to chambers re PSZJ July monthly fee statement (.20); emails G. Brown and J. Lucas re same (.10)	0.30	495.00	\$148.50
09/19/2022	BDD	CP	Begin working on draft of PSZJ Aug fee statement (.30) and emails G. Brown re same (.10).	0.40	495.00	\$198.00
09/20/2022	GNB	CP	Review and edit PSZJ second fee statement.	0.30	925.00	\$277.50
09/20/2022	BDD	CP	Revisions to PSZJ July fee statement (.1) and work on August fee statement (2.1); multiple emails to G. Brown and S. Lee re same (.30); calls with G. Brown re same (.10)	2.60	495.00	\$1,287.00
09/21/2022	IAWN	CP	Review J. Lucas email regarding fee application	0.10	1295.00	\$129.50
09/21/2022	BDD	CP	Email G. Brown re email service of monthly fee applications.	0.10	495.00	\$49.50
				<b>7.90</b>		<b>\$4,850.50</b>

**Comp. of Prof./Others**

09/06/2022	GNB	CPO	Email Tabish Rizvi regarding IslandDundon employment application and procedures for fee statements and interim fee applications.	0.20	925.00	\$185.00
09/13/2022	BDD	CPO	Review monthly fee statement procedures and emails G. Brown re same.	0.20	495.00	\$99.00
09/20/2022	GNB	CPO	Briefly review debtors' August fee statements; Email PSZJ regarding same.	0.10	925.00	\$92.50
09/23/2022	BDD	CPO	Email G. Brown re Pillsbury Madison Amended Monthly Fee Statement (Jun 29, 2022 - July 31, 2022).	0.10	495.00	\$49.50
				<b>0.60</b>		<b>\$426.00</b>

**Financing [B230]**

09/01/2022	GNB	FN	Briefly review Debtor's July MOR and forward same to Tabish Rizvi.	0.10	925.00	\$92.50
09/01/2022	JIS	FN	Call with Debtor regarding DIP financing and mediation status.	0.40	1525.00	\$610.00
09/01/2022	JIS	FN	Call with J. Lucas re follow up to call with Debtor	0.20	1525.00	\$305.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			on fees, DIP financing.			
09/06/2022	GNB	FN	Email with paralegals and with John W. Lucas regarding PSZJ timesheets for Debtor counsel's budgeting request.	0.10	925.00	\$92.50
09/06/2022	JIS	FN	Call with J. Lucas regarding DIP and discovery status.	0.30	1525.00	\$457.50
09/08/2022	GNB	FN	Review emails from Paul Weiss regarding draft DIP financing papers; Email Committee regarding same.	0.10	925.00	\$92.50
09/08/2022	IAWN	FN	Review M. Litvak emails regarding DIP loan details	0.20	1295.00	\$259.00
09/12/2022	JIS	FN	(Partial) Attend meeting regarding financing.	0.80	1525.00	\$1,220.00
09/12/2022	MBL	FN	Review and comment on draft DIP commitment letter and proposed DIP order.	1.50	1275.00	\$1,912.50
09/12/2022	MBL	FN	Call with team re DIP and pending issues.	1.00	1275.00	\$1,275.00
09/12/2022	MBL	FN	Draft DIP summary and issues list for team.	0.90	1275.00	\$1,147.50
09/12/2022	MBL	FN	Review first day declaration, draft DIP motion, budget, and background materials.	0.80	1275.00	\$1,020.00
09/12/2022	MBL	FN	Review real estate appraisals.	0.20	1275.00	\$255.00
09/12/2022	JWL	FN	Call with Dundon regarding DIP (.6); review DIP commitment letter, DIP Order, term sheet, and motion (1.0).	1.60	1095.00	\$1,752.00
09/13/2022	JIS	FN	Call J. Lucas regarding DIP financing call with Debtor.	0.10	1525.00	\$152.50
09/13/2022	MBL	FN	Call with debtor counsel and J. Lucas re DIP issues.	0.50	1275.00	\$637.50
09/13/2022	MBL	FN	Pre-call with J. Lucas re DIP financing call with debtor.	0.20	1275.00	\$255.00
09/13/2022	JWL	FN	Call with G. Novod regarding DIP financing strategy (.4); review DIP terms (.5); call with Madison counsel and UCC advisors regarding DIP motion and terms (.6); call with J. Stang regarding DIP (.3).	1.80	1095.00	\$1,971.00
09/14/2022	MBL	FN	Emails with Dundon and J. Lucas re DIP issues (.1); review budget analysis (.1).	0.20	1275.00	\$255.00
09/15/2022	IAWN	FN	Review DIP motion	0.20	1295.00	\$259.00
09/15/2022	JIS	FN	Call I. Scharf re case issues regarding financing.	0.40	1525.00	\$610.00
09/15/2022	MBL	FN	Review revised DIP order and funds flow; emails	0.40	1275.00	\$510.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			with team and debtor counsel re same.			
09/15/2022	JWL	FN	Review revised DIP order, funds flow, and budget.	1.00	1095.00	\$1,095.00
09/16/2022	MBL	FN	Attention to DIP motion and applicable deadline.	0.20	1275.00	\$255.00
09/20/2022	GNB	FN	Email with state court counsel and PSZJ regarding DIP motion.	0.10	925.00	\$92.50
09/20/2022	IAWN	FN	Review article regarding DIP loan	0.10	1295.00	\$129.50
09/20/2022	MBL	FN	Call with J. Lucas re DIP objection.	0.20	1275.00	\$255.00
09/22/2022	IAWN	FN	Review value of real estate email from M. Litvak	0.10	1295.00	\$129.50
09/22/2022	MBL	FN	Review DIP motion.	0.20	1275.00	\$255.00
09/23/2022	MBL	FN	Draft objection to DIP motion.	3.50	1275.00	\$4,462.50
09/26/2022	MBL	FN	Review J. Lucas comments to DIP objection.	0.20	1275.00	\$255.00
09/26/2022	JWL	FN	Review and revise DIP Objection.	1.00	1095.00	\$1,095.00
09/27/2022	MSP	FN	Telephone call with John W. Lucas re: DIP Financing Motion, 2004 examination status, etc.	0.20	1095.00	\$219.00
09/27/2022	MBL	FN	Revise DIP objection (0.7); coordinate with J. Lucas re same (0.1).	0.80	1275.00	\$1,020.00
09/27/2022	JWL	FN	Prepare and send summary of DIP objection to the committee and counsel.	0.60	1095.00	\$657.00
09/28/2022	IAWN	FN	Review J. Lucas email explaining DIP financing motion issues	0.10	1295.00	\$129.50
09/28/2022	JWL	FN	Call with A. Kornberg regarding DIP motion.	0.30	1095.00	\$328.50
09/29/2022	MSP	FN	Telephone call with John W. Lucas re: DIP Financing Motion.	0.40	1095.00	\$438.00
09/29/2022	MBL	FN	Call with J. Lucas re DIP objection and discovery.	0.20	1275.00	\$255.00
09/29/2022	JWL	FN	Call with M. Pagay regarding DIP financing (.4); research regarding DIP financing (1.5).	1.90	1095.00	\$2,080.50
09/29/2022	SWG	FN	Draft discovery to Debtor re: DIP motion	0.80	775.00	\$620.00
09/30/2022	MSP	FN	Telephone call with John W. Lucas re: DIP Financing Motion.	0.20	1095.00	\$219.00
09/30/2022	MBL	FN	Review DIP motion re alternative DIP issues (.3); emails with team re same (.1).	0.40	1275.00	\$510.00
				<b>24.50</b>		<b>\$29,641.50</b>

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<b>General Creditors Comm. [B150]</b>						
09/01/2022	JIS	GC	Attend state court counsel meeting.	0.40	1525.00	\$610.00
09/01/2022	MSP	GC	Attend state court counsel meeting.	0.40	1095.00	\$438.00
09/01/2022	JWL	GC	Prepare for call with state court counsel regarding discovery and case status (.2); call with state court counsel regarding case status (.4); call with G. Novod regarding case status (.2); call with J. Stang, A. Kornberg, A. Parlen regarding case status (.4); follow up call with J. Stang regarding same (.2).	1.40	1095.00	\$1,533.00
09/02/2022	GNB	GC	Telephone conference with John W. Lucas regarding status of issues and upcoming considerations for Committee consideration/strategy.	0.30	925.00	\$277.50
09/02/2022	JWL	GC	Call with G. Brown regarding case updates.	0.30	1095.00	\$328.50
09/07/2022	JNP	GC	Conference with John W. Lucas regarding Committee strategy issues.	0.30	1445.00	\$433.50
09/07/2022	JWL	GC	Call with J. Pomerantz regarding strategy issues.	0.30	1095.00	\$328.50
09/08/2022	GNB	GC	Draft email to state court counsel in lieu of meeting today.	0.30	925.00	\$277.50
09/08/2022	IAWN	GC	Review G. Brown update to Committee and edit	0.20	1295.00	\$259.00
09/08/2022	IAWN	GC	Exchange emails with G. Brown, James I. Stang regarding update	0.10	1295.00	\$129.50
09/08/2022	IAWN	GC	Email James I. Stang regarding update	0.10	1295.00	\$129.50
09/08/2022	JIS	GC	Revise memo to state court counsel regarding status.	0.20	1525.00	\$305.00
09/12/2022	GNB	GC	Internal PSZJ call in preparation for Committee meeting today.	1.00	925.00	\$925.00
09/12/2022	GNB	GC	Zoom call with Committee members, state court counsel, PSZJ, and IslandDundon.	1.20	925.00	\$1,110.00
09/12/2022	IAWN	GC	Telephone conference with team regarding strategy	1.00	1295.00	\$1,295.00
09/12/2022	IAWN	GC	Telephone conference with Committee regarding strategy	1.20	1295.00	\$1,554.00
09/12/2022	JIS	GC	Call with PSZJ team re status of insurance investigation and National discovery.	0.50	1525.00	\$762.50
09/12/2022	JWL	GC	All hands PSZJ call regarding case update and strategy (1.0); prepare agenda for Sept. 12 committee meeting (.4); attend weekly committee	2.60	1095.00	\$2,847.00

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			call on case status and strategy (1.2).			
09/13/2022	GNB	GC	Revise and edit minutes of yesterday's Committee meeting.	0.10	925.00	\$92.50
09/14/2022	GNB	GC	Consider emails from state court counsel regarding additional subpoena parties for insurance policies.	0.10	925.00	\$92.50
09/15/2022	GNB	GC	Email John W. Lucas regarding agenda for today's phone conference with state court counsel.	0.10	925.00	\$92.50
09/15/2022	GNB	GC	Attend Zoom meeting with PSZJ lawyers and state court counsel.	0.80	925.00	\$740.00
09/15/2022	GNB	GC	Telephone conference with John W. Lucas regarding Committee strategy.	0.10	925.00	\$92.50
09/15/2022	IAWN	GC	Telephone conference with state court counsel regarding mediation	0.80	1295.00	\$1,036.00
09/15/2022	IAWN	GC	Review J. Lucas agenda for meeting re mediation	0.10	1295.00	\$129.50
09/15/2022	IAWN	GC	Review G. Brown summary of committee meeting	0.10	1295.00	\$129.50
09/15/2022	JIS	GC	Call with state court counsel regarding status of insurance discovery, mediation, DIP financing.	0.80	1525.00	\$1,220.00
09/15/2022	JIS	GC	Follow up on call with state court counsel.	0.20	1525.00	\$305.00
09/15/2022	JWL	GC	Prepare agenda for weekly counsel call (.2); attend weekly counsel strategy call (.8);	1.00	1095.00	\$1,095.00
09/18/2022	GNB	GC	Email Malhar S. Pagay and John W. Lucas regarding Committee meeting issues.	0.10	925.00	\$92.50
09/19/2022	GNB	GC	Review materials produced in informal discovery in preparation for Committee meeting today.	0.80	925.00	\$740.00
09/19/2022	GNB	GC	Email PSZJ team regarding Committee representation issue.	0.20	925.00	\$185.00
09/19/2022	GNB	GC	Attend Committee call.	1.60	925.00	\$1,480.00
09/19/2022	GNB	GC	Revise and edit minutes from today's Committee call.	0.10	925.00	\$92.50
09/19/2022	GNB	GC	Telephone conference with John W. Lucas regarding survivor claims.	0.40	925.00	\$370.00
09/19/2022	GNB	GC	Email state court counsel (Audrey Perlman; Steven Gershowitz) regarding survivor claim issues.	0.20	925.00	\$185.00
09/19/2022	JIS	GC	Meeting with Committee regarding mediation, discovery, insurance coverage (1.6); prepare for	1.70	1525.00	\$2,592.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			same (.1).			
09/19/2022	JWL	GC	Prepare agenda for weekly committee member call (.3); attend weekly committee member call (1.6); call with G. Brown regarding claims info (.4);	2.30	1095.00	\$2,518.50
09/20/2022	IAWN	GC	Exchange emails with team and J. Freeman regarding press	0.10	1295.00	\$129.50
09/21/2022	IAWN	GC	Exchange emails with G. Brown regarding state court counsel meeting	0.10	1295.00	\$129.50
09/22/2022	GNB	GC	Video conference with state court counsel regarding open issues in case and strategy.	0.70	925.00	\$647.50
09/22/2022	GNB	GC	Email with Audrey Perlman regarding Committee issue.	0.10	925.00	\$92.50
09/22/2022	GNB	GC	Email Lisa Busch and Jared Scotto regarding Committee issue.	0.20	925.00	\$185.00
09/22/2022	GNB	GC	Email John W. Lucas regarding Monday Committee call.	0.10	925.00	\$92.50
09/22/2022	GNB	GC	Prepare for state court counsel meeting regarding open issues in case and strategy.	0.10	925.00	\$92.50
09/22/2022	JWL	GC	Call with state court counsel regarding case strategy (.7); follow up call with I. Nasatir regarding same (.2).	0.90	1095.00	\$985.50
09/23/2022	GNB	GC	Review Jennifer Freeman emails regarding Committee business.	0.10	925.00	\$92.50
09/23/2022	GNB	GC	Telephone conference with Audrey Raphael regarding Committee issue (.1); Email Audrey Raphael, T. Cruz, and M. Coleman regarding same (.1).	0.20	925.00	\$185.00
09/26/2022	GNB	GC	Video conference Committee meeting.	1.00	925.00	\$925.00
09/26/2022	GNB	GC	Revise and edit minutes to Committee meeting; Email with Tabish Rizvi regarding Committee meeting today.	0.10	925.00	\$92.50
09/26/2022	JWL	GC	Prepare for weekly committee member meeting (.3); attend weekly committee member meeting regarding case status (1.0); follow up call with G. Brown regarding next steps (.1);	1.40	1095.00	\$1,533.00
09/27/2022	GNB	GC	Email with John W. Lucas regarding yesterday's Committee call and Committee issues; Email minutes to Committee members and their state court	0.10	925.00	\$92.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			counsel.			
09/27/2022	JWL	GC	Call with S. Gershowitz regarding case status.	0.60	1095.00	\$657.00
09/28/2022	GNB	GC	Telephone conference with John W. Lucas regarding various Committee issues.	0.30	925.00	\$277.50
09/28/2022	JIS	GC	Telephone conference with J. Lucas regarding case issues	0.40	1525.00	\$610.00
09/28/2022	JWL	GC	Call with G. Novod regarding case strategy (.6); call with J. Stang regarding case strategy (.4); call with G. Brown regarding case updates (.3);	1.30	1095.00	\$1,423.50
09/29/2022	GNB	GC	Video conference with John W. Lucas and state court counsel for weekly call regarding upcoming issues.	0.70	925.00	\$647.50
09/29/2022	JWL	GC	Prepare for (.3) and attend weekly committee call with state court counsel (.7).	1.00	1095.00	\$1,095.00
				<b>32.90</b>		<b>\$36,809.50</b>

### Insurance Coverage

09/12/2022	IAWN	IC	Exchange emails with debtor regarding slotting chart	0.10	1295.00	\$129.50
09/12/2022	IAWN	IC	Review slotting chart	0.10	1295.00	\$129.50
09/13/2022	IAWN	IC	Review slotting chart	0.10	1295.00	\$129.50
09/13/2022	IAWN	IC	Exchange emails and telephone calls with debtor regarding trigger	0.20	1295.00	\$259.00
09/13/2022	IAWN	IC	Exchange emails with James I. Stang regarding trigger	0.10	1295.00	\$129.50
09/13/2022	JIS	IC	Call with Debtor professionals regarding insurance chart.	0.50	1525.00	\$762.50
09/13/2022	JWL	IC	Attend call with Madison bankruptcy and insurance counsel regarding coverage questions.	0.50	1095.00	\$547.50
09/14/2022	IAWN	IC	Exchange emails with James I. Stang regarding trigger	0.10	1295.00	\$129.50
09/19/2022	IAWN	IC	Exchange emails with J. Lucas regarding slotting chart	0.10	1295.00	\$129.50
09/21/2022	IAWN	IC	Exchange emails with B. Dassa regarding document room	0.10	1295.00	\$129.50
09/21/2022	IAWN	IC	Review coverage chart regarding mediation parties	0.10	1295.00	\$129.50

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09/21/2022	IAWN	IC	Exchange emails with G. Brown regarding Travelers	0.10	1295.00	\$129.50
09/21/2022	IAWN	IC	Review Century file regarding updating information	1.00	1295.00	\$1,295.00
09/21/2022	IAWN	IC	Review emails from state court counsel regarding evidence of insurance	0.20	1295.00	\$259.00
09/21/2022	IAWN	IC	Exchange emails with A. Kornberg regarding Century issues	0.10	1295.00	\$129.50
09/21/2022	BDD	IC	Emails G. Brown and I. Nasatir re insurance policy research.	0.10	495.00	\$49.50
09/22/2022	BDD	IC	Research multiple insurance policies in Everlaw and emails G. Brown and I. Nasatir re same.	6.40	495.00	\$3,168.00
09/23/2022	JIS	IC	Review historical financial statements referencing insurance and auditors.	0.90	1525.00	\$1,372.50
09/24/2022	IAWN	IC	Exchange emails with J. Stang and G. Brown regarding data room and status of review	0.20	1295.00	\$259.00
09/24/2022	IAWN	IC	Respond to J. Freeman email regarding insurance	0.10	1295.00	\$129.50
09/24/2022	IAWN	IC	Review J. Freeman emails regarding evidence of insurance	0.10	1295.00	\$129.50
09/26/2022	IAWN	IC	Review Amala email and attachments re insurance	0.80	1295.00	\$1,036.00
09/26/2022	IAWN	IC	Review renewal insurance information	0.80	1295.00	\$1,036.00
09/26/2022	IAWN	IC	Exchange emails with Amala re insurance	0.10	1295.00	\$129.50
09/26/2022	IAWN	IC	Exchange emails with J. Lucas re renewal insurance information	0.10	1295.00	\$129.50
09/26/2022	IAWN	IC	Exchange emails with J. Stang re directors and officers claims	0.10	1295.00	\$129.50
				<b>13.10</b>		<b>\$11,986.50</b>

### Mediation

09/07/2022	GNB	ME	Email Malhar S. Pagay and John W. Lucas regarding mediation.	0.10	925.00	\$92.50
09/13/2022	GNB	ME	Email with PSZJ regarding mediation and insurance.	0.10	925.00	\$92.50
09/13/2022	IAWN	ME	Exchange emails with team regarding Galardi delay on mediation progress	0.20	1295.00	\$259.00
09/13/2022	IAWN	ME	Review G. Brown email regarding J. Chapman telephone call	0.10	1295.00	\$129.50



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09/13/2022	JIS	ME	Call with Paul Weiss regarding insurance assumptions and discovery issues.	0.60	1525.00	\$915.00
09/13/2022	JWL	ME	Call with Madison counsel regarding Covington report (.6);	0.60	1095.00	\$657.00
09/14/2022	IAWN	ME	Exchange emails with team regarding people on mediation call	0.10	1295.00	\$129.50
09/14/2022	MSP	ME	Telephone call with John W. Lucas re: proposed mediation session, etc.	0.30	1095.00	\$328.50
09/14/2022	MSP	ME	Email exchange with James I. Stang, et al. re: proposed mediation session.	0.10	1095.00	\$109.50
09/15/2022	IAWN	ME	Exchange emails with Eisen and J. Lucas regarding mediation call	0.10	1295.00	\$129.50
09/19/2022	IAWN	ME	Telephone call with J. Lucas and J. Stang regarding mediation re insurance	0.30	1295.00	\$388.50
09/19/2022	IAWN	ME	Telephone conference with J. Lucas regarding mediator	0.10	1295.00	\$129.50
09/19/2022	IAWN	ME	Review J. Lucas agendas	0.10	1295.00	\$129.50
09/19/2022	IAWN	ME	Telephone call with mediator and Committee	1.00	1295.00	\$1,295.00
09/19/2022	IAWN	ME	Telephone conferences with J. Stang regarding mediation	0.30	1295.00	\$388.50
09/19/2022	IAWN	ME	Telephone conference with mediator, PSZJ team, and Paul Weiss.	0.90	1295.00	\$1,165.50
09/19/2022	JIS	ME	Mediation call with Debtor.	0.90	1525.00	\$1,372.50
09/19/2022	JIS	ME	Call with mediator regarding case status.	1.00	1525.00	\$1,525.00
09/19/2022	JIS	ME	Mediation session with Debtor and mediator.	0.90	1525.00	\$1,372.50
09/19/2022	JIS	ME	Call I. Nasatir re insurance issues related to excess carriers.	0.10	1525.00	\$152.50
09/19/2022	JIS	ME	Call I. Nasatir regarding follow up to call with mediator and Debtor.	0.20	1525.00	\$305.00
09/19/2022	JIS	ME	Follow up with J. Lucas and I. Nasatir regarding J. Chapman meeting.	0.30	1525.00	\$457.50
09/19/2022	JWL	ME	Attend mediation session with J. Stang, I. Nasatir (1.0); follow up call with J. Stang and I. Nasatir regarding the same (.3); attend mediation session	2.20	1095.00	\$2,409.00

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			with PSZJ and Paul Weiss, and Pillsbury regarding settlement issues (.9);			
09/20/2022	JIS	ME	Call J. Amala regarding mediation status.	0.90	1525.00	\$1,372.50
09/20/2022	JIS	ME	Call with mediator re case status.	0.70	1525.00	\$1,067.50
09/20/2022	JIS	ME	Follow up with J. Lucas from call with mediator.	0.10	1525.00	\$152.50
09/20/2022	JWL	ME	Call with J. Stang (.1) and mediator (.7) regarding settlement.	0.80	1095.00	\$876.00
09/21/2022	GNB	ME	Email John W. Lucas regarding Committee information relating to mediation.	0.10	925.00	\$92.50
09/21/2022	IAWN	ME	Exchange emails and texts with J. Lucas regarding J. Chapman mediation	0.20	1295.00	\$259.00
09/21/2022	KHB	ME	Confer with J. Stang re mediation issues and ability to recover restricted assets.	0.30	1395.00	\$418.50
09/21/2022	JWL	ME	Strategy call with M. Pagay regarding settlement issues.	0.30	1095.00	\$328.50
09/22/2022	IAWN	ME	Telephone conference with J. Lucas regarding mediation	0.20	1295.00	\$259.00
09/22/2022	IAWN	ME	Telephone call with state court counsel regarding mediation status.	0.70	1295.00	\$906.50
09/22/2022	IAWN	ME	Review summary of J. Chapman call	0.10	1295.00	\$129.50
09/23/2022	JIS	ME	Telephone conference with K. Brown regarding mediation issues	0.30	1525.00	\$457.50
09/27/2022	GNB	ME	Review John W. Lucas emails regarding mediation and regarding DIP Motion; Email with Jason Amala regarding same.	0.10	925.00	\$92.50
09/27/2022	IAWN	ME	Exchange emails with J. Lucas re mediation position	0.10	1295.00	\$129.50
09/27/2022	IAWN	ME	Review J. Lucas email to mediator	0.10	1295.00	\$129.50
09/27/2022	JWL	ME	Prepare and send mediation summary to committee and counsel regarding Oct. 6 mediation.	0.70	1095.00	\$766.50
09/28/2022	GNB	ME	Review state court counsel emails regarding mediation.	0.10	925.00	\$92.50
09/28/2022	IAWN	ME	Review mediator and J. Lucas emails re call	0.10	1295.00	\$129.50
09/28/2022	IAWN	ME	Review J. Lucas email to state court counsel re mediator call	0.10	1295.00	\$129.50

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09/28/2022	IAWN	ME	Review state court counsel responses to J. Lucas	0.10	1295.00	\$129.50
09/28/2022	JWL	ME	Call with Mediator regarding case status (.3); email to PSZJ team regarding the same (.3);	0.60	1095.00	\$657.00
09/29/2022	IAWN	ME	Review J. Lucas emails to state court counsel re mediation attendance	0.10	1295.00	\$129.50
09/29/2022	JWL	ME	Emails with committee member counsel regarding mediation strategy (.8); call with J. Eisen regarding Oct. 6 mediation (.2); call with J. Chapman regarding mediation (.1); call with J. Amala regarding mediation (.5);	1.60	1095.00	\$1,752.00
09/30/2022	IAWN	ME	Review G. Brown and J. Lucas emails re mediation	0.10	1295.00	\$129.50
09/30/2022	IAWN	ME	Review Eisen email re attendance at mediation	0.10	1295.00	\$129.50
09/30/2022	IAWN	ME	Satisfy mediation entrance requirements	0.10	1295.00	\$129.50
				<b>19.30</b>		<b>\$24,778.50</b>

**Ret. of Prof./Other**

09/06/2022	BDD	RPO	Call with G. Brown re IslandDundon retention order.	0.10	495.00	\$49.50
09/07/2022	GNB	RPO	Email with John W. Lucas regarding presentment date on IslandDundon employment application; Email Beth D. Dassa regarding change of calendaring deadlines regarding same; Email Tabish Rizvi regarding same.	0.10	925.00	\$92.50
09/16/2022	JWL	RPO	Prepare supplemental declaration for S. Dundon and Island.	1.50	1095.00	\$1,642.50
09/19/2022	JWL	RPO	Review and revise proposed order for retention of Dundon and Island (.4); review and revise Dundon supplemental declaration (.5).	0.90	1095.00	\$985.50
09/27/2022	GNB	RPO	Email IslandDundon team regarding issues to resolve per UST's request regarding employment application.	0.10	925.00	\$92.50
09/28/2022	GNB	RPO	Review Island edits to Supplemental Declaration of Robert Lieber.	0.10	925.00	\$92.50
09/30/2022	GNB	RPO	Revise and reconcile supplemental declarations of Robert Lieber and Matthew Dundon in support of IslandDundon's employment application at request of Andrea Schwartz.	1.50	925.00	\$1,387.50
				<b>4.30</b>		<b>\$4,342.50</b>

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
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**TOTAL SERVICES FOR THIS MATTER:**

**\$168,981.00**

Pachulski Stang Ziehl & Jones LLP  
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**Expenses**

09/02/2022	FE	54162.00004 FedEx Charges for 09-02-22	23.65
09/02/2022	FE	54162.00004 FedEx Charges for 09-02-22	23.65
09/02/2022	RE	( 36 @0.10 PER PG)	3.60
09/16/2022	LN	54162.00004 Lexis Charges for 09-16-22	76.76
09/19/2022	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
09/19/2022	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
09/20/2022	FE	54162.00004 FedEx Charges for 09-20-22	23.70
09/20/2022	FE	54162.00004 FedEx Charges for 09-20-22	23.70
09/20/2022	RE	( 31 @0.10 PER PG)	3.10
09/20/2022	RE	( 49 @0.10 PER PG)	4.90
09/20/2022	RE	( 80 @0.10 PER PG)	8.00
09/20/2022	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
09/21/2022	FE	54162.00004 FedEx Charges for 09-21-22	23.70
09/21/2022	RE2	SCAN/COPY ( 46 @0.10 PER PG)	4.60
09/21/2022	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
09/23/2022	AF	Air Fare [E110] United Airlines, Tkt. 01624371358562, from SFO to EWR, EWR to SFO, JWL	450.00
09/23/2022	LN	54162.00004 Lexis Charges for 09-23-22	9.59
09/24/2022	LN	54162.00004 Lexis Charges for 09-24-22	383.76
09/29/2022	RE2	SCAN/COPY ( 36 @0.10 PER PG)	3.60
09/29/2022	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
09/29/2022	RE2	SCAN/COPY ( 36 @0.10 PER PG)	3.60
09/30/2022	LN	54162.00004 Lexis Charges for 09-30-22	24.12
09/30/2022	OS	Everlaw, Inv. 66757, Madison database for the month of September	500.00

**Total Expenses for this Matter**

**\$1,599.53**

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
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**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 09/30/2022**

<b>Total Fees</b>	<b>\$168,981.00</b>
<b>Total Expenses</b>	<b>1,599.53</b>
<b>Less Courtesy Discount</b>	<b>\$34,921.00</b>
<b>Total Due on Current Invoice</b>	<b>\$135,659.53</b>

**Outstanding Balance from prior invoices as of 09/30/2022 (May not include recent payments)**

<b><u>A/R Bill Number</u></b>	<b><u>Invoice Date</u></b>	<b><u>Fees Billed</u></b>	<b><u>Expenses Billed</u></b>	<b><u>Balance Due</u></b>
130635	07/31/2022	\$127,920.00	\$291.19	\$128,211.19
130861	08/31/2022	\$198,760.00	\$4,027.47	\$202,787.47

**Total Amount Due on Current and Prior Invoices: \$466,658.19**

**Objection Deadline: December 6, 2022**

James I. Stang (admitted *pro hac vice*)  
Iain A.W. Nasatir  
John W. Lucas  
Malhar S. Pagay (admitted *pro hac vice*)  
Gillian N. Brown  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34th Floor  
New York, NY 10017-2024  
Telephone: 212.561.7700  
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Emails: jstang@pszjlaw.com  
inasatir@pszjlaw.com  
jlucas@pszjlaw.com  
mpagay@pszjlaw.com  
gbrown@pszjlaw.com

*Counsel to the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
:  
In re : Chapter 11  
:  
MADISON SQUARE BOYS & GIRLS CLUB, : Case No. 22-10910-SHL  
INC.,<sup>1</sup> :  
:  
Debtor. :  
:  
-----X

**FOURTH MONTHLY FEE STATEMENT OF  
PACHULSKI STANG ZIEHL & JONES LLP FOR  
COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR THE PERIOD FROM OCTOBER 1, 2022 THROUGH OCTOBER 31, 2022**

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<sup>1</sup>The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional:	Official Committee of Unsecured Creditors
Services to:	Official Committee of Unsecured Creditors
Date of Retention:	July 16, 2022
Period for which compensation and reimbursement is sought:	October 1, 2022 through October 31, 2022
Monthly Fees Incurred:	\$225,732.50
Fee Reduction:	(\$52,412.50) <sup>2</sup>
Fees (After Reduction):	\$173,320.00
20% Holdback:	\$34,664.00
Total Fees Less 20% Holdback:	\$138,656.00
Monthly Expenses Incurred:	\$3,451.38
Total Fees and Expenses Due:	\$142,107.38

This is a   X   monthly        interim        final application

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, the *Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to*

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<sup>2</sup> As disclosed in the Firm's employment application, the Firm is utilizing rates that are reduced from standard rates so that attorney time is capped at \$900 per hour and paralegal time is capped at \$400 per hour. The reduction set forth in this Fee Statement here accounts for the reduction from the following standard rates, as set forth in Exhibit A hereto: J. Stang (\$1,525); K. Brown (\$1,395); I. Nasatir (\$1,295); M. Litvak (\$1,275); M. Pagay (\$1,095); J. Lucas (\$1,095); B. Levine (\$1,045); R. Saunders; (\$1,025); G. Brown (\$925); B. Dassa (\$495); L. Forrester (\$495); P. Jeffries (\$495); and M. Matteo (\$460).



*the Official Committee of Unsecured Creditors Effective as of July 16, 2022* [Docket No. 196] (the “PSZJ Retention Order”), and the *Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [Docket No. 125] (the “Interim Compensation Order”),<sup>3</sup> Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors (the “Committee”) hereby submits this fourth monthly fee statement (the “Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Committee in this chapter 11 case (the “Case”) during the period October 1, 2022 to October 31, 2022 (the “Fee Period”).

By this Fee Statement, PSZJ seeks payment in the amount of \$142,107.38, comprised of the following: (i) \$138,656.00, which is eighty percent (80%) of the total amount of fees incurred for actual and necessary services rendered during the Fee Period, and (ii) reimbursement of \$3,451.38, which is one hundred percent (100%) of actual and necessary expenses that PSZJ incurred in connection with its representation of the Committee during the Fee Period.

### **Services Rendered and Expenses Incurred**

1. Attached as **Exhibit A** is a summary of PSZJ’s professionals by individual, setting forth the (i) name and title of each individual who provided services in connection with this chapter 11 case during the Fee Period, (ii) the year of bar admission for each PSZJ attorney, (iii) the current, standard hourly billing rate for each individual at PSZJ working on this chapter 11 case during the Fee Period, (iv) the capped hourly rate for those individuals, and (v) the total fees that each individual billed to this Case during the Fee Period at the applicable capped billing rate. The Committee hired PSZJ on the condition that the total fees incurred would be discounted to the extent the blended rate of PSZJ attorneys does not exceed \$900.00 per hour. All of the

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<sup>3</sup> Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

PSZJ attorneys who worked on this Case during the Fee Period have standard billing rates in excess of \$900.00 per hour. As provided in the PSZJ Retention Order, PSZJ paralegal hourly rates on this Case do not exceed \$400.00 per hour. All of the PSZJ paralegals who worked on this Case during the Fee Period have standard billing rates in excess of \$400.00 per hour. PSZJ is providing a reduction in attorney and paralegal fees for the Fee Period in the amount of \$52,412.50.

2. Attached as **Exhibit B** is a summary of the services PSZJ rendered during the Fee Period and the compensation it seeks, by project category.

3. Attached as **Exhibit C** is a summary of expenses that PSZJ incurred during the Fee Period and for which it seeks reimbursement.

4. Attached as **Exhibit D** is itemized time detail of PSZJ professionals during the Fee Period and summary materials related thereto.

#### **Notice and Objection Procedures**

5. Notice of this Fee Statement shall be given by hand or overnight delivery, or by email where available, upon (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Tim McChristian); (b) Debtor's counsel: Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Andrew M. Parlen, John T. Weber, and Miriam Levi); and (c) William K. Harrington, United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz and Tara Tiantian) (the "**Notice Parties**").

6. Objections to this Fee Statement, if any, must be filed with the Court and served upon PSZJ and the other Notice Parties (set forth at para. 5, above) so as to be received no later

than **fifteen (15) calendar days after filing of the Fee Statement** (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

7. If no Objections to this Fee Statement are filed and served as set forth above, the Debtor shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses set forth in this Fee Statement.

8. If an Objection to this Fee Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. *See* Interim Compensation Order. To the extent such an Objection is not resolved between PSZJ and the party filing the Objection, the Objection shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: November 21, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Gillian N. Brown

James I. Stang (admitted *pro hac vice*)

Iain A.W. Nasatir

John W. Lucas

Malhar S. Pagay (admitted *pro hac vice*)

Gillian N. Brown

780 Third Avenue, 34th Floor

New York, NY 10017-2024

Telephone: 212.561.7700

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Emails: jstang@pszjlaw.com

inasatir@pszjlaw.com

jluca@pszjlaw.com

mpagay@pszjlaw.com

gbrown@pszjlaw.com

*Counsel to the Official Committee of Unsecured  
Creditors*

**EXHIBIT A**

**Compensation by Professional**

**SUMMARY OF COMPENSATION BY PROFESSIONAL  
FOR SERVICES RENDERED FOR THE PERIOD  
OCTOBER 1, 2022 – OCTOBER 31, 2022**

<b>Name of Professional Partners and Counsel</b>	<b>Title</b>	<b>Year Admitted</b>	<b>Standard Hourly Rate (\$)</b>	<b>Capped Hourly Rate in this Case (\$)</b>	<b>Total Billed Hours</b>	<b>Total Compensation at Capped Rate (\$)</b>
James I. Stang	Partner	1980	1,525.00	900.00	17.60	15,840.00
Kenneth H. Brown	Partner	1981	1,395.00	900.00	0.20	180.00
Iain A.W. Nasatir	Partner	1983	1,295.00	900.00	46.50	41,850.00
Maxim B. Litvak	Partner	1997	1,275.00	900.00	6.70	6,030.00
Malhar S. Pagay	Partner	1997	1,095.00	900.00	15.30	13,770.00
John W. Lucas	Partner	2005	1,095.00	900.00	71.50	64,350.00
Beth E. Levine	Counsel	1993	1,045.00	900.00	0.70	630.00
Robert M. Saunders	Counsel	1995	1,025.00	900.00	3.90	3,510.00
Gillian N. Brown	Counsel	1999	925.00	900.00	14.80	13,320.00
<b>Total Partners and Counsel:</b>					<b>177.20</b>	<b>\$159,480.00</b>

<b>Name of Paralegals and Other Non-Legal Staff</b>	<b>Standard Hourly Billing Rate (\$)</b>	<b>Capped Hourly Rate in this Case (\$)</b>	<b>Total Billed Hours</b>	<b>Total Compensation at Capped Rate (\$)</b>
Beth D. Dassa	495.00	400.00	10.10	4,040.00
Leslie A. Forrester	495.00	400.00	2.60	1,040.00
Patricia J. Jeffries	495.00	400.00	0.80	320.00
Michael A. Matteo	460.00	400.00	21.10	8,440.00
<b>Total Paralegals and Other Non-Legal Staff:</b>			<b>34.60</b>	<b>\$13,840.00</b>

<b>ALL PROFESSIONALS</b>	<b>DISCOUNTED/CAPPED BLENDED RATE (\$)</b>	<b>TOTAL BILLED HOURS</b>	<b>TOTAL COMPENSATION (\$)</b>
Attorneys	900.00	177.20	159,480.00
Paralegals, Non-Legal Staff	400.00	34.60	13,840.00
<b>Total Hours and Fees Incurred</b>		<b>211.80</b>	<b>\$173,320.00</b>

**EXHIBIT B**

**Compensation by Task Code**

**AGGREGATE TIME SUMMARY BY TASK CODE  
FOR THE PERIOD OCTOBER 1, 2022 – OCTOBER 31, 2022**

<b>Task Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees (\$)</b>
AA	Asset Analysis & Recovery	1.20	1,374.00
BL	Bankruptcy Litigation	72.20	60,892.50
CA	Case Administration	1.90	1,112.50
CO	Claims Admin/Objections	2.10	2,282.50
CP	Compensation of Professionals	2.80	1,859.00
FN	Financing	13.70	16,793.50
GC	General Creditors Committee	36.50	41,838.50
HE	Hearings	2.80	3,626.00
ME	Mediation	64.20	78,471.00
NT	Non-Working Travel	13.00	16,035.00
PD	Plan & Disclosure Statement	0.40	438.00
RPO	Retention of Professionals/Other	1.00	1,010.00
	<b>TOTAL</b>	<b>211.80</b>	\$225,732.50 less discount of \$52,412.50, for total of <b>\$173,320.00</b>

**EXHIBIT C**

**Expense Summary**



**AGGREGATE ITEMIZED EXPENSES FOR THE PERIOD  
OCTOBER 1, 2022 – OCTOBER 31, 2022**

<b>Expenses Category</b>	<b>Total Expenses</b>
Bloomberg	10.00
Delivery/Courier Service	2,434.77
Federal Express	264.00
Lexis/Nexis Legal Research	47.41
Outside Services	134.00
Postage	17.00
Reproduction Expense	24.90
Reproduction/Scan Copy	19.30
Research	500.00
<b>TOTAL</b>	<b>\$3,451.38</b>

**EXHIBIT D**

**Itemized Time Detail for the Fee Period**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

October 31, 2022

Invoice 131231

Client 54162

Matter 00004

**GNB**

GNB

RE: Committee Representaton

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 10/31/2022**

FEES	\$225,732.50
EXPENSES	\$3,451.38
COURTESY DISCOUNT	(\$52,412.50)
<b>TOTAL CURRENT CHARGES</b>	<b>\$176,771.38</b>
<b>BALANCE FORWARD</b>	<b>\$466,658.19</b>
<b>LAST PAYMENT</b>	<b>\$92,364.47</b>
<b>TOTAL BALANCE DUE</b>	<b>\$551,065.10</b>

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BDD	Dassa, Beth D.	Paralegal	495.00	10.10	\$4,999.50
BEL	Levine, Beth E.	Counsel	1045.00	0.70	\$731.50
GNB	Brown, Gillian N.	Counsel	925.00	14.80	\$13,690.00
IAWN	Nasatir, Iain A. W.	Partner	1295.00	46.50	\$60,217.50
JIS	Stang, James I.	Partner	1525.00	17.60	\$26,840.00
JWL	Lucas, John W.	Partner	1095.00	71.50	\$78,292.50
KHB	Brown, Kenneth H.	Partner	1395.00	0.20	\$279.00
LAF	Forrester, Leslie A.	Other	495.00	2.60	\$1,287.00
MAM	Matteo, Mike A.	Paralegal	460.00	21.10	\$9,706.00
MBL	Litvak, Maxim B.	Partner	1275.00	6.70	\$8,542.50
MSP	Pagay, Malhar S.	Partner	1095.00	15.30	\$16,753.50
PJJ	Jeffries, Patricia J.	Paralegal	495.00	0.80	\$396.00
RMS	Saunders, Robert M.	Counsel	1025.00	3.90	\$3,997.50
				211.80	\$225,732.50

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	1.20	\$1,374.00
BL	Bankruptcy Litigation [L430]	72.20	\$60,892.50
CA	Case Administration [B110]	1.90	\$1,112.50
CO	Claims Admin/Objections[B310]	2.10	\$2,282.50
CP	Compensation Prof. [B160]	2.80	\$1,859.00
FN	Financing [B230]	13.70	\$16,793.50
GC	General Creditors Comm. [B150]	36.50	\$41,838.50
H	Hearings	2.80	\$3,626.00
ME	Mediation	64.20	\$78,471.00
NT	Non-Working Travel	13.00	\$16,035.00
PD	Plan & Disclosure Stmt. [B320]	0.40	\$438.00
RPO	Ret. of Prof./Other	1.00	\$1,010.00
		211.80	<hr/> \$225,732.50

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
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**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Bloomberg	\$10.00
Delivery/Courier Service	\$2,434.77
Federal Express [E108]	\$264.00
Lexis/Nexis- Legal Research [E	\$47.41
Outside Services	\$134.00
Postage [E108]	\$17.00
Reproduction Expense [E101]	\$24.90
Reproduction/ Scan Copy	\$19.30
Research [E106]	\$500.00
	<hr/>
	\$3,451.38

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
10/10/2022	KHB	AA	Telephone call with J. Lucas re review of purported donor restrictions.	0.10	1395.00	\$139.50
10/10/2022	MSP	AA	Meeting with T. Rizvi, John W. Lucas et al. re: Asset Liquidation Analysis.	0.90	1095.00	\$985.50
10/10/2022	JWL	AA	Telephone call with K. Brown re donor restrictions	0.10	1095.00	\$109.50
10/31/2022	KHB	AA	Email J. Stang re possible complaint to determine restricted assets	0.10	1395.00	\$139.50
				<b>1.20</b>		<b>\$1,374.00</b>
<b>Bankruptcy Litigation [L430]</b>						
10/02/2022	GNB	BL	Email Iain A.W. Nasatir regarding Carlton Fields issue with proposed Rule 2004 order; Email Liza Ebanks regarding October 13 hearing date on Rule 2004 motion; Email Miriam Levi regarding same.	0.10	925.00	\$92.50
10/02/2022	GNB	BL	Email Iain A.W. Nasatir in response to questions regarding Carlton Fields' inquiry about proposed Rule 2004 order.	0.20	925.00	\$185.00
10/02/2022	IAWN	BL	Exchange emails with Gillian Brown re Carlton Fields issue	0.10	1295.00	\$129.50
10/02/2022	IAWN	BL	Review Gillian Brown email with debtors re hearing date	0.10	1295.00	\$129.50
10/02/2022	IAWN	BL	Exchange emails with Gillian Brown re Carlton Fields	0.20	1295.00	\$259.00
10/03/2022	GNB	BL	Telephone conference with Nora Valenza-Frost regarding AIG issues with proposed Rule 2004 order.	0.30	925.00	\$277.50
10/03/2022	GNB	BL	Email with Michael A. Matteo regarding subpoenas issued pursuant to Rule 2004 orders and service issues thereon.	0.70	925.00	\$647.50
10/03/2022	GNB	BL	Revise proposed Rule 2004 order per insurer counsel comments.	0.80	925.00	\$740.00
10/03/2022	GNB	BL	Email with Iain A.W. Nasatir regarding Rule 2004 subpoena and service issues.	0.30	925.00	\$277.50
10/03/2022	GNB	BL	Consider Nora Valenza-Frost suggested edited to proposed Rule 2004 order on behalf of AIG.	0.10	925.00	\$92.50

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/03/2022	GNB	BL	Draft email response to Jillian Dennehy at Kennedys regarding proposed Rule 2004 motion; Email Beth D. Dassa regarding notice of hearing on docket no. 111 (Rule 2004 motion).	0.10	925.00	\$92.50
10/03/2022	IAWN	BL	Review agenda from Gillian Brown	0.10	1295.00	\$129.50
10/03/2022	IAWN	BL	Exchange emails with Philadelphia Indemnity re discovery	0.20	1295.00	\$259.00
10/03/2022	IAWN	BL	Exchange emails with Matteo and Anderson re service on ORIC	0.30	1295.00	\$388.50
10/03/2022	IAWN	BL	Review coverage definition in subpoena	0.10	1295.00	\$129.50
10/03/2022	IAWN	BL	Exchange emails with Gillian Brown re document request definition	0.10	1295.00	\$129.50
10/03/2022	MAM	BL	Follow up email to Iain Nasatir regarding RSUI Group, Inc. subpoena service.	0.10	460.00	\$46.00
10/03/2022	MAM	BL	Draft RSUI Group, Inc. subpoena.	0.20	460.00	\$92.00
10/03/2022	MAM	BL	Email to Janice Washington regarding status of subpoena service to Public Mutual Insurance.	0.10	460.00	\$46.00
10/03/2022	MAM	BL	Update tracking chart and virtual file regarding status of subpoena service to Public Mutual Insurance.	0.10	460.00	\$46.00
10/03/2022	BDD	BL	Email G. Brown re notice of continued hearing on Rule 2004 motion.	0.10	495.00	\$49.50
10/04/2022	GNB	BL	Revise notice of continued hearing on Rule 2004 motion.	0.10	925.00	\$92.50
10/04/2022	GNB	BL	Email Sophia Lee regarding service of notice of continued hearing on Rule 2004 motion; Review email from Riley Mendoza regarding Motors Insurance Company edit to proposed notice of hearing.	0.10	925.00	\$92.50
10/04/2022	GNB	BL	Email with Michael A. Matteo and Janice Washington regarding subpoenas to be served today.	0.10	925.00	\$92.50
10/04/2022	GNB	BL	Review registered agent information for foreign insurers.	0.10	925.00	\$92.50
10/04/2022	GNB	BL	Email with Gregg Galardi regarding final changes to proposed stipulation and order between Committee and Rockefeller University.	0.10	925.00	\$92.50
10/04/2022	GNB	BL	Draft email to Chambers regarding stipulation	0.30	925.00	\$277.50



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			between the Committee and The Rockefeller University.			
10/04/2022	GNB	BL	Draft email to Nora Valenza-Frost regarding proposed edits to Rule 2004 order.	0.30	925.00	\$277.50
10/04/2022	GNB	BL	Revise proposed order on Rule 2004 (.2); Draft email to objecting non-Rockefeller counsel regarding same (.3).	0.50	925.00	\$462.50
10/04/2022	GNB	BL	Email with Iain A.W. Nasatir regarding proposed Rule 2004 motion.	0.10	925.00	\$92.50
10/04/2022	IAWN	BL	Review Gillian Brown emails re 2004 to subpoenaed parties	0.30	1295.00	\$388.50
10/04/2022	IAWN	BL	Exchange emails with Gillian Brown re open issues	0.10	1295.00	\$129.50
10/04/2022	IAWN	BL	Review emails between Gregg Galardi and Gillian Brown re edits	0.20	1295.00	\$259.00
10/04/2022	MAM	BL	Revise and forward RSUI Group, Inc. 2004 subpoena to Janice Washington for service.	0.20	460.00	\$92.00
10/04/2022	MAM	BL	Draft and forward Hallmark parent company 2004 subpoena to Janice Washington for service.	0.20	460.00	\$92.00
10/04/2022	MAM	BL	Update subpoena tracking chart with third tranche of 2004 subpoena targets and service details.	0.80	460.00	\$368.00
10/04/2022	MAM	BL	Draft email and forward further copies of 2004 subpoenas to the U.S.Trustee's office.	0.20	460.00	\$92.00
10/04/2022	LAF	BL	Company research re: Bermuda entity.	1.80	495.00	\$891.00
10/04/2022	BDD	BL	Prepare Notice of Cont'd Hearing of 2004 Motion (re insurers) and emails G. Brown and N. Brown re same.	0.50	495.00	\$247.50
10/05/2022	GNB	BL	Email with Iain A.W. Nasatir and Beth D. Dassa regarding issues with Debtor's production of certain insurance policies.	0.10	925.00	\$92.50
10/05/2022	GNB	BL	Review stipulated order relating to Committee and Rockefeller; Email PSZJ team regarding same.	0.10	925.00	\$92.50
10/05/2022	GNB	BL	Revise amended certification of no objection regarding Travelers.	0.20	925.00	\$185.00
10/05/2022	GNB	BL	Email Beth D. Dassa and Michael A. Matteo regarding calendaring and tracking issues on Rule 2004 motion re insurance.	0.10	925.00	\$92.50
10/05/2022	GNB	BL	Consider proposed edits from Geoff Miller	0.20	925.00	\$185.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			(Dentons) and Nora Valenza-Frost (Carlton Fields) to Rule 2004 motion (.15), and email Iain A. W. Nasatir and Malhar S. Pagay regarding recommendations as to same (.05).			
10/05/2022	GNB	BL	Email with Michael A. Matteo regarding issues on service of subpoenas to foreign entities; Email Malhar S. Pagay regarding same.	0.10	925.00	\$92.50
10/05/2022	GNB	BL	Telephone conference with Malhar S. Pagay regarding Rule 2004 order negotiations.	0.30	925.00	\$277.50
10/05/2022	GNB	BL	Email with Iain A.W. Nasatir regarding potential new Rule 2004 motion to additional insurers.	0.10	925.00	\$92.50
10/05/2022	GNB	BL	Email objecting insurers regarding Geoff Miller's proposed edits to Rule 2004 order.	0.10	925.00	\$92.50
10/05/2022	IAWN	BL	Exchange emails with Gillian Brown re production of policies	0.10	1295.00	\$129.50
10/05/2022	IAWN	BL	Review Gillian Brown email re stipulation	0.10	1295.00	\$129.50
10/05/2022	IAWN	BL	Exchange emails with Gillian Brown re second wave discovery	0.10	1295.00	\$129.50
10/05/2022	IAWN	BL	Exchange emails with Michael Matteo re extension to subpoena	0.10	1295.00	\$129.50
10/05/2022	IAWN	BL	Review Gillian Brown email re BGCA	0.10	1295.00	\$129.50
10/05/2022	MAM	BL	Updates to tracking chart and virtual file regarding proof of service of subpoena to Public Service Mutual.	0.10	460.00	\$46.00
10/05/2022	MAM	BL	Updates to tracking chart and virtual file regarding proof of service of subpoena to Seaboard Surety.	0.10	460.00	\$46.00
10/05/2022	MAM	BL	Draft 2004 subpoena to Premia Holdings Inc.	0.20	460.00	\$92.00
10/05/2022	MAM	BL	Draft 2004 subpoena to Star Stone Specialty Insurance.	0.20	460.00	\$92.00
10/06/2022	IAWN	BL	Exchange emails with Beth Dassa and debtor re blurry documents in Everlaw	0.20	1295.00	\$259.00
10/06/2022	MAM	BL	Email to Gillian N. Brown regarding status of Premia Holdings and Star Stone subpoenas.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Update tracking chart regarding stipulation and agreed order with The Rockefeller University.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to United States Fidelity & Casualty Company.	0.10	460.00	\$46.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/06/2022	MAM	BL	Draft 2004 subpoena to THE TRAVELERS INDEMNITY COMPANY (AND ITS AFFILIATES INCLUDING THE AETNA CASUALTY AND SURETY COMPANY, GULF INSURANCE COMPANY AND ST. PAUL FIRE AND MARINE INSURANCE COMPANY)	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to Travelers Casualty and Surety Company, Inc.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to TIG INSURANCE COMPANY AS SUCCESSOR BY MERGER TO FAIRMONT SPECIALTY INSURANCE COMPANY (F/K/A RANGER INSURANCE COMPANY).	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to RIUNIONE DI SICURTA (N/K/A ALLIANZ S/P/A.).	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to NORTH STAR REINSURANCE CORPORATION.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to National Union Fire Insurance Company of Pittsburgh, PA.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to MOTORS INSURANCE CORPORATION.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to THE MONARCH INSURANCE COMPANY OF OHIO.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to MIC PROPERTY & CASUALTY INSURANCE CORPORATION.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to LANDMARK INSURANCE COMPANY.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to INSURANCE COMPANY OF NORTH AMERICA.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to ILLINOIS NATIONAL INSURANCE COMPANY.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to GUARANTY NATIONAL INSURANCE COMPANY.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to Great American Insurance Company.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to GENERAL STAR NATIONAL INSURANCE COMPANY.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to FIREMAN'S FUND	0.10	460.00	\$46.00

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			INSURANCE COMPANY.			
10/06/2022	MAM	BL	Draft 2004 subpoena to Federal Insurance Company.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to CIM INSURANCE CORPORATION.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to Chubb Group Holdings, Inc.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to CENTURY INDEMNITY COMPANY (SUCCESSOR TO CCI INSURANCE COMPANY, SUCCESSOR TO INSURANCE COMPANY OF NORTH AMERICA).	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to American Home Assurance Company.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to Allianz Resolution Management.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to Allianz Global Risks US Insurance Company.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to American International Group, Inc.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to Aetna Casualty & Surety Company.	0.10	460.00	\$46.00
10/06/2022	MAM	BL	Draft 2004 subpoena to Arrowood Indemnity Company f/k/a Royal Indemnity Company and as Successor to Royal Insurance Company of America.	0.10	460.00	\$46.00
10/06/2022	MSP	BL	Email with John W. Lucas re: Rule 2004 motion and case status.	0.40	1095.00	\$438.00
10/06/2022	MSP	BL	Email with Gillian N. Brown re: status of insurer Rule 2004 motion.	0.40	1095.00	\$438.00
10/06/2022	BDD	BL	Confer with Everlaw re docs produced by Paul Weiss that are unreadable (.30); emails I. Nasatir and G. Brown re same (.2).	0.50	495.00	\$247.50
10/07/2022	IAWN	BL	Review Carlton Fields emails with Malhar Pagay	0.10	1295.00	\$129.50
10/07/2022	IAWN	BL	Review North Star email	0.10	1295.00	\$129.50
10/07/2022	MSP	BL	Email exchange with Gillian N. Brown re: Insurer Rule 2004 motion.	0.10	1095.00	\$109.50
10/09/2022	GNB	BL	E-mail Malhar S. Pagay and John W. Lucas regarding October 13 hearing on Rule 2004 motion.	0.10	925.00	\$92.50
10/09/2022	MSP	BL	Email exchange with John W. Lucas, et al. re:	0.10	1095.00	\$109.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			October 13 hearing.			
10/10/2022	GNB	BL	E-mail with PSZJ team regarding Rule 2004 hearing on Thursday and hearing agenda (.1); Email with Malhar S. Pagay regarding proposed order on Rule 2004 motion (.2).	0.20	925.00	\$185.00
10/10/2022	IAWN	BL	Review Carlton Fields email re 2004	0.10	1295.00	\$129.50
10/10/2022	IAWN	BL	Exchange emails with Malhar Pagay and Carlton re telephone call	0.10	1295.00	\$129.50
10/10/2022	MSP	BL	Email exchange with John W. Lucas, S. Hasan, Gillian N. Brown et al. re: October 13 hearing agenda.	1.10	1095.00	\$1,204.50
10/10/2022	MSP	BL	Attention to resolving remaining issues re: insurer Rule 2004 motion (2.8); revise order re: same (.10); and email exchange with Gillian N. Brown, N. Valenza-Frost, et al. re: same (.20).	3.10	1095.00	\$3,394.50
10/10/2022	PJJ	BL	Research Everlaw for deeds.	0.40	495.00	\$198.00
10/11/2022	IAWN	BL	Review hearing emails with AIG	0.40	1295.00	\$518.00
10/11/2022	IAWN	BL	Telephone call with AIG	0.10	1295.00	\$129.50
10/11/2022	IAWN	BL	Telephone call with Malhar Pagay re AIG	0.10	1295.00	\$129.50
10/11/2022	IAWN	BL	Review Malhar Pagay email about agenda	0.10	1295.00	\$129.50
10/11/2022	IAWN	BL	Review agenda	0.10	1295.00	\$129.50
10/11/2022	MSP	BL	Telephone call with Iain Nasatir re: proposed order re: insurers 2004 motion.	0.10	1095.00	\$109.50
10/11/2022	MSP	BL	Meeting with N. Valenza-Frost, Iain Nasatir re: proposed order resolving 2004 motion to certain insurers.	0.20	1095.00	\$219.00
10/11/2022	MSP	BL	Draft Agenda Notice for insurer 2004 motion hearing (.5); email exchange with J. Weber, John W. Lucas, et al. re: same (.10); attention to filing same (.80).	1.40	1095.00	\$1,533.00
10/11/2022	MSP	BL	Attention to resolving remaining issues re: insurer Rule 2004 motion (2.0); revise order re: same (2.70); email exchange with N. Valenza-Frost, John W. Lucas, Iain Nasatir, et al. re: same (.10).	4.80	1095.00	\$5,256.00
10/12/2022	GNB	BL	Email PSZJ team regarding edits to proposed Rule 2004 order and facts for tomorrow's hearing thereon.	0.40	925.00	\$370.00
10/12/2022	GNB	BL	Review email from Gary Seligman; Email with	0.10	925.00	\$92.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Jillian Dennehy at Kennedys regarding edits to proposed Rule 2004 motion; review email from Mark Plevin regarding proposed Rule 2004 motion.			
10/12/2022	IAWN	BL	Exchange emails with Malhar Pagay and Gillian Brown re discovery	0.10	1295.00	\$129.50
10/12/2022	IAWN	BL	Review North Star email re 2004	0.10	1295.00	\$129.50
10/12/2022	IAWN	BL	Exchange emails with Malhar Pagay and Gillian Brown re overall status of 2004 responses	0.30	1295.00	\$388.50
10/12/2022	IAWN	BL	Exchange emails with Gillian Brown and Malhar Pagay re Rockefeller University position vs. Chubb and overall responses	1.50	1295.00	\$1,942.50
10/12/2022	IAWN	BL	Review coverage chart	0.10	1295.00	\$129.50
10/12/2022	IAWN	BL	Review Plevin and Malhar Pagay emails re local rules	0.20	1295.00	\$259.00
10/12/2022	IAWN	BL	Email counsel for debtor questions re coverage chart	0.10	1295.00	\$129.50
10/12/2022	IAWN	BL	Exchange emails with John Weber re current insurance	0.10	1295.00	\$129.50
10/12/2022	IAWN	BL	Review letter agreement re John Weber current insurance	0.10	1295.00	\$129.50
10/12/2022	IAWN	BL	Respond to John Weber re current insurance	0.10	1295.00	\$129.50
10/12/2022	IAWN	BL	Review M. Plevin and Malhar Pagay emails re local rules	0.20	1295.00	\$259.00
10/12/2022	IAWN	BL	Exchange emails with Gregg Galardi re 2004	0.20	1295.00	\$259.00
10/12/2022	IAWN	BL	Email Malhar Pagay re M. Plevin email	0.10	1295.00	\$129.50
10/12/2022	IAWN	BL	Telephone call with J. Stang regarding Rule 2004 hearing	0.20	1295.00	\$259.00
10/12/2022	JIS	BL	Call I. Nasatir regarding status of insurance issues for 10.13 hearing.	0.20	1525.00	\$305.00
10/12/2022	BEL	BL	Emails with Malhar S. Pagay regarding upcoming filing.	0.20	1045.00	\$209.00
10/12/2022	BEL	BL	Email with Malhar S. Pagay regarding discovery disputes.	0.20	1045.00	\$209.00
10/13/2022	GNB	BL	E-mail with Iain A.W. Nasatir regarding preparation for today's hearing on Rule 2004 motion.	0.10	925.00	\$92.50
10/13/2022	GNB	BL	Email with Sophia Lee regarding service to	0.10	925.00	\$92.50

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			Seaboard Surety.			
10/13/2022	IAWN	BL	Pull together latest Century financials and review same	2.40	1295.00	\$3,108.00
10/13/2022	IAWN	BL	Review John Weber changes to letter agreement	0.10	1295.00	\$129.50
10/13/2022	IAWN	BL	Respond re John Weber changes to letter agreement	0.10	1295.00	\$129.50
10/13/2022	IAWN	BL	Exchange emails with Mark Plevin re 2004 agreements	0.20	1295.00	\$259.00
10/13/2022	IAWN	BL	Exchange telephone calls with Mark Plevin re 2004	0.10	1295.00	\$129.50
10/13/2022	MAM	BL	Review and reply to email from Gillian N. Brown regarding Seaboard Surety.	0.20	460.00	\$92.00
10/13/2022	MAM	BL	Review and reply to further email from Gillian N. Brown regarding Seaboard Surety service issues.	0.10	460.00	\$46.00
10/13/2022	MAM	BL	Update tracking chart and virtual file regarding executed proof of service of 2004 subpoena served on A.G. Risk Management.	0.20	460.00	\$92.00
10/13/2022	BEL	BL	Emails with Malhar S. Pagay regarding submission of order.	0.30	1045.00	\$313.50
10/13/2022	LAF	BL	Locate Century Indemnity information	0.80	495.00	\$396.00
10/14/2022	IAWN	BL	Telephone call with debtor's coverage counsel	0.80	1295.00	\$1,036.00
10/14/2022	IAWN	BL	Draft and send email to mediator re insurance mediation	0.10	1295.00	\$129.50
10/14/2022	IAWN	BL	Review Malhar Pagay email re hearing	0.10	1295.00	\$129.50
10/14/2022	IAWN	BL	Review Malhar Pagay revisions to 2004 order	0.10	1295.00	\$129.50
10/14/2022	IAWN	BL	Exchange emails with Malhar Pagay re 2004	0.10	1295.00	\$129.50
10/14/2022	IAWN	BL	Exchange emails and telephone calls with Klein and Malhar Pagay re 2004	0.20	1295.00	\$259.00
10/14/2022	IAWN	BL	Review and analyze latest coverage chart	0.10	1295.00	\$129.50
10/14/2022	IAWN	BL	Email with John Lucas re email summary	0.10	1295.00	\$129.50
10/14/2022	IAWN	BL	Email with John Lucas re insurance	0.10	1295.00	\$129.50
10/14/2022	IAWN	BL	Telephone call with Mark Plevin re 2004	0.40	1295.00	\$518.00
10/14/2022	MAM	BL	Update subpoena tracking chart regarding AG Risk Management.	0.10	460.00	\$46.00
10/14/2022	MAM	BL	Return telephone call from Dena Aaito of AG Risk	0.10	460.00	\$46.00

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			Management regarding subpoena.			
10/14/2022	BDD	BL	Email I. Nasatir re documents produced by various insurance companies.	0.10	495.00	\$49.50
10/17/2022	IAWN	BL	Exchange emails with Mark Plevin and Malhar Pagay re 2004 agreements	0.30	1295.00	\$388.50
10/17/2022	MAM	BL	Research as to service addresses for Gillian N. Brown regarding various insurance entities.	0.60	460.00	\$276.00
10/17/2022	BDD	BL	Email G. Brown, I. Nasatir and M. Pagay re additional documents for Everlaw	0.10	495.00	\$49.50
10/18/2022	GNB	BL	Email with Beth D. Dassa and Michael A. Matteo regarding Rule 2004 subpoena issues and document productions.	0.10	925.00	\$92.50
10/18/2022	IAWN	BL	Exchange emails with Malhar Pagay re service on foreign insurers	0.10	1295.00	\$129.50
10/18/2022	IAWN	BL	Exchange emails with Malhar Pagay re second wave of discovery	0.10	1295.00	\$129.50
10/18/2022	MAM	BL	Update tracking chart and virtual file regarding response to subpoena from Church Mutual Insurance.	0.20	460.00	\$92.00
10/18/2022	MAM	BL	Email to Gillian N. Brown regarding response to subpoena from Church Mutual Insurance.	0.10	460.00	\$46.00
10/18/2022	MAM	BL	Update tracking chart and virtual file regarding response to subpoena from Argonaut Insurance.	0.20	460.00	\$92.00
10/18/2022	MAM	BL	Locate and forward New York Department of Finance records to Malhar S. Pagay regarding StarStone Specialty Insurance.	0.30	460.00	\$138.00
10/18/2022	PJJ	BL	Research regarding service upon Premia and Starstone.	0.40	495.00	\$198.00
10/19/2022	GNB	BL	Email Iain A.W. Nasatir and Beth D. Dassa regarding Rockefeller University document production; Email with Amit Roitman regarding same.	0.10	925.00	\$92.50
10/19/2022	IAWN	BL	Analyze Levi email and new coverage chart	0.40	1295.00	\$518.00
10/19/2022	IAWN	BL	Review Malhar Pagay email re hearing	0.10	1295.00	\$129.50
10/19/2022	IAWN	BL	Exchange emails with Pagay and Brown re subpoenas	0.10	1295.00	\$129.50
10/19/2022	IAWN	BL	Review emails between Malhar Pagay and Plevin re	0.10	1295.00	\$129.50



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			hearing			
10/19/2022	BDD	BL	Email G. Brown re document production received from Carlton Fields re various insurance companies.	0.10	495.00	\$49.50
10/19/2022	BDD	BL	Email N. Valenza-Frost re production of insurance related documents.	0.10	495.00	\$49.50
10/20/2022	GNB	BL	Review Malhar S. Pagay order on Rule 2004 motion; Email with Iain A.W. Nasatir and Michael A. Matteo regarding issuance of subpoenas.	0.10	925.00	\$92.50
10/20/2022	GNB	BL	Email with Jason Amala regarding insurance; Email with Iain A.W. Nasatir regarding Great Atlantic.	0.10	925.00	\$92.50
10/20/2022	IAWN	BL	Review Malhar Pagay summary of discovery status	0.10	1295.00	\$129.50
10/20/2022	IAWN	BL	Exchange emails with Malhar Pagay re 2004 agreements	0.20	1295.00	\$259.00
10/20/2022	IAWN	BL	Review Malhar Pagay and Gillian Brown emails re Rockefeller University production	0.10	1295.00	\$129.50
10/20/2022	MAM	BL	Update virtual file and subpoena tracking chart regarding response from The Rockefeller University.	0.20	460.00	\$92.00
10/20/2022	MAM	BL	Update subpoena tracking chart with third order docket number for third tranche of subpoenas.	0.20	460.00	\$92.00
10/20/2022	BDD	BL	Email M. Levi re Paul Weiss document production (re illegible insurance documents).	0.10	495.00	\$49.50
10/20/2022	BDD	BL	Email G. Brown re Rockefeller production.	0.10	495.00	\$49.50
10/20/2022	BDD	BL	Email N. Valenza-Frost re Carlton Fields document production.	0.10	495.00	\$49.50
10/21/2022	GNB	BL	Email with Michael A. Matteo regarding subpoenas to non-Rockefeller objecting subpoena parties.	0.20	925.00	\$185.00
10/21/2022	MAM	BL	Revise 2004 subpoena to The Travelers Indemnity Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to The Travelers Casualty & Surety Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to TIG Insurance Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to ALLIANZ S/P/A F/K/A RIUNIONE.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to North Star Reinsurance Company.	0.10	460.00	\$46.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/21/2022	MAM	BL	Revise 2004 subpoena to National Union Fire Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Motors Insurance Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to The Monarch Insurance Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to MIC Property & Casualty Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Landmark Insurance Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to United States Fidelity.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Insurance Company of North America.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Illinois National Insurance.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Guaranty National Insurance.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Great American Insurance.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to General Star National.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Fireman's Fund.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Federal Insurance Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to CIM Insurance Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Chubb Insurance Company.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Century Indemnity.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to American Home Assurance.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Allianz Resolution.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Allianz Global.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to AIG Insurance.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Aetna Insurance.	0.10	460.00	\$46.00
10/21/2022	MAM	BL	Revise 2004 subpoena to Arrowood Insurance.	0.10	460.00	\$46.00

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10/21/2022	MAM	BL	Review certificate of service and update subpoena tracking chart with counsel service information.	0.30	460.00	\$138.00
10/21/2022	MAM	BL	Global changes to 2004 subpoenas in the third tranche regarding service to counsel.	0.80	460.00	\$368.00
10/24/2022	GNB	BL	Draft letter from Michael A. Matteo to insurance counsel for service of subpoena (per Order at Docket 250) (.1); Draft Exhibit A to subpoenas (.4); Email with Michael A. Matteo regarding instructions for service (.1); Review draft exemplar of subpoena package and edit same (.1).	0.70	925.00	\$647.50
10/24/2022	GNB	BL	Email John Weber and Miriam Levi regarding subpoenas for Rule 2004 document production; Email Andrea Schwartz and Tara Tien regarding same; Email Michael A. Matteo regarding additional counsel for email acceptance of service of subpoenas.	0.10	925.00	\$92.50
10/24/2022	IAWN	BL	Exchange emails with R. Saunders re assignments	0.20	1295.00	\$259.00
10/24/2022	MAM	BL	Emails to Gillian N. Brown regarding third tranche subpoenas questions.	0.30	460.00	\$138.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Arrowood Indemnity.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Aetna Casualty.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding A.I.G.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Allianz Global.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Allianz Resolution.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding American Home Assurance.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Century Indemnity.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding CHUBB.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding CIM Insurance.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with	0.20	460.00	\$92.00

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			Order regarding Fireman's Fund.			
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding General Star National.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Guaranty National.	0.20	460.00	\$92.00
10/24/2022	MAM	BL	Updates to tracking chart and virtual files regarding third tranche 2004 subpoenas.	0.60	460.00	\$276.00
10/25/2022	GNB	BL	Email updates with Michael A. Matteo regarding subpoenas to insurers' counsel; Email John Weber and Miriam Levi regarding same.	0.10	925.00	\$92.50
10/25/2022	GNB	BL	Review email from Mark Plevin regarding acceptance of subpoenas; Email with Michael A. Matteo regarding subpoenas for service.	0.10	925.00	\$92.50
10/25/2022	GNB	BL	Email with Nora Valenza-Frost regarding document production issues for AIG companies.	0.10	925.00	\$92.50
10/25/2022	IAWN	BL	Review Gillian Brown emails with Mark Plevin re service	0.10	1295.00	\$129.50
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Illinois National Insurance Co.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Insurance Company of North America.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Landmark Insurance Co.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding MIC Property & Casualty Insurance.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding The Monarch Insurance Co.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Motors Insurance Corp.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding National Union Fire Insurance.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding North Star Reinsurance.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding RIUNIONE DI SICURTA (N/K/A ALLIANZ S/P/A.)	0.20	460.00	\$92.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding TIG Insurance.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Organize subpoena and exhibit and cover letter with Order regarding Federal Insurance Company.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Revise and forward subpoena for Insurance Company of North America.	0.20	460.00	\$92.00
10/25/2022	MAM	BL	Updates to subpoena tracking chart regarding responses received from Mark Plevin.	0.20	460.00	\$92.00
10/25/2022	BDD	BL	Emails N. Valenza-Frost and G. Brown re Carlton Fields document production.	0.20	495.00	\$99.00
10/25/2022	BDD	BL	Analyze Blank Rome and Carlton Fields produced documents and multiple emails with Everlaw re same (2.3); work on production log re same (.60).	2.90	495.00	\$1,435.50
10/25/2022	BDD	BL	Email M. Levi re Paul Weiss produced insurance documents.	0.10	495.00	\$49.50
10/25/2022	BDD	BL	Email I. Nasatir re Paul Weiss produced insurance documents.	0.10	495.00	\$49.50
10/26/2022	GNB	BL	Telephone conferences with Beth D. Dassa regarding problems with AIG document production format.	0.20	925.00	\$185.00
10/26/2022	GNB	BL	Review emails between Beth D. Dassa and Nora Valenza-Frost regarding re-bates numbering of documents from AIG companies; Email with Beth D. Dassa regarding same.	0.10	925.00	\$92.50
10/26/2022	MAM	BL	Update tracking chart regarding completed service of Great American Insurance subpoena.	0.10	460.00	\$46.00
10/26/2022	MAM	BL	Update subpoena tracking chart with responsive email from Arrowood Indemnity counsel.	0.10	460.00	\$46.00
10/26/2022	RMS	BL	Legal research regarding insurance policies	0.90	1025.00	\$922.50
10/26/2022	BDD	BL	Email N. Romagnoli at Blank Rome re Rockefeller production.	0.10	495.00	\$49.50
10/26/2022	BDD	BL	Email A. Roitman re Rockefeller production.	0.10	495.00	\$49.50
10/26/2022	BDD	BL	Work with K. Zhou at Everlaw re document uploading/production.	0.60	495.00	\$297.00
10/26/2022	BDD	BL	Emails N. Valenza-Frost re Carlton Fields document productions.	0.10	495.00	\$49.50

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10/26/2022	BDD	BL	Email K. LaBrada re Everlaw document productions/uploads.	0.10	495.00	\$49.50
10/26/2022	BDD	BL	Revisions to document production log and email G. Brown re same (.1); telephone conferences with G. Brown re same (.2).	0.30	495.00	\$148.50
10/27/2022	GNB	BL	Review emails from Gary Seligman regarding acceptance of subpoenas; Voicemail and email for Lorraine Armenti regarding subpoena to Arrowood; Revise subpoena tracking chart.	0.10	925.00	\$92.50
10/27/2022	GNB	BL	Telephone call with Lorraine Armenti regarding subpoena duces tecum to Arrowood (.1); Email Lorraine Armenti memorializing agreement relating to same (.1).	0.20	925.00	\$185.00
10/27/2022	GNB	BL	Email with Malhar S. Pagay and Michael A. Matteo regarding Bermuda insurance company subpoenas.	0.10	925.00	\$92.50
10/27/2022	GNB	BL	Review email from Michael Kotula regarding Riunione subpoena; Review email from Gary Seligman regarding General Star, North Star, and The Monarch subpoenas.	0.10	925.00	\$92.50
10/27/2022	GNB	BL	Email with internal team regarding StarStone subpoena.	0.10	925.00	\$92.50
10/27/2022	IAWN	BL	Review article re Chubb settlement	0.20	1295.00	\$259.00
10/27/2022	IAWN	BL	Review J. Freeman email re Chubb settlement	0.10	1295.00	\$129.50
10/27/2022	IAWN	BL	Respond to J. Freeman email	0.10	1295.00	\$129.50
10/27/2022	MAM	BL	Update subpoena tracking chart regarding acceptance of service for North Star Reinsurance.	0.10	460.00	\$46.00
10/27/2022	MAM	BL	Update subpoena tracking chart regarding acceptance of service for Monarch Insurance.	0.10	460.00	\$46.00
10/27/2022	MAM	BL	Update subpoena tracking chart regarding acceptance of service for General Star National Insurance.	0.10	460.00	\$46.00
10/27/2022	MAM	BL	Follow up email to Gillian N. Brown regarding status of Church Mutual Insurance subpoena.	0.10	460.00	\$46.00
10/27/2022	MAM	BL	Follow up email to Gillian N. Brown regarding status of Bermuda entities subpoenas.	0.10	460.00	\$46.00
10/27/2022	MAM	BL	Updates to subpoena tracking chart regarding responses to subpoenas.	0.40	460.00	\$184.00

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10/27/2022	MAM	BL	Research regarding Starstone Specialty Insurance Company and subsidiaries.	0.40	460.00	\$184.00
10/28/2022	GNB	BL	Revise subpoena tracking chart.	0.10	925.00	\$92.50
10/28/2022	GNB	BL	Email with Iain A.W. Nasatir regarding INA (Rule 2004 subpoena) and Mark Plevin email regarding same.	0.10	925.00	\$92.50
10/28/2022	GNB	BL	Review email from Nora Valenza-Frost regarding AIG companies' document production; Review email from Geoffrey Miller regarding Aetna subpoena; Review emails from Nora Valenza-Frost regarding subpoenas to American Home, Illinois National, Landmark Insurance, AIG, and National Union subpoenas.	0.10	925.00	\$92.50
10/28/2022	GNB	BL	Review and edit subpoena package to StarStone; Review and edit subpoena package to TIG.	0.10	925.00	\$92.50
10/28/2022	IAWN	BL	Review Gillian Brown emails re subpoena spreadsheet	0.10	1295.00	\$129.50
10/28/2022	IAWN	BL	Review Gillian Brown and Malhar Pagay emails re service of subpoena to M. Plevin	0.10	1295.00	\$129.50
10/28/2022	MAM	BL	Revise and forward subpoena package to StarStone Specialty Insurance.	0.20	460.00	\$92.00
10/28/2022	MAM	BL	Update subpoena tracking chart regarding responses to 2004 subpoenas.	0.20	460.00	\$92.00
10/28/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding acceptance of subpoena from counsel for Landmark Casual.	0.10	460.00	\$46.00
10/28/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding acceptance of subpoena from counsel for National Union Fire.	0.10	460.00	\$46.00
10/28/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding acceptance of subpoena from counsel for Illinois National Insurance.	0.10	460.00	\$46.00
10/28/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding acceptance of subpoena from counsel for American Home Assurance.	0.10	460.00	\$46.00
10/28/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding non-acceptance of subpoena from counsel for American International Group.	0.10	460.00	\$46.00

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10/28/2022	MAM	BL	Revise 2004 subpoena letter to registered agent for TIG Insurance.	0.20	460.00	\$92.00
10/28/2022	MAM	BL	Registered agent research for TIG Insurance.	0.20	460.00	\$92.00
10/28/2022	MAM	BL	Revise 2004 subpoena to TIG Insurance.	0.20	460.00	\$92.00
10/28/2022	MAM	BL	Email to Gillian N. Brown regarding service status for 2004 subpoena to TIG Insurance.	0.10	460.00	\$46.00
10/28/2022	MAM	BL	Update subpoena tracking chart regarding response from RSUI Insurance.	0.10	460.00	\$46.00
10/28/2022	RMS	BL	Legal research regarding insurance policies	0.10	1025.00	\$102.50
10/30/2022	RMS	BL	Legal research regarding insurance policies	0.80	1025.00	\$820.00
10/31/2022	GNB	BL	Review email from Mark Plevin regarding acceptance of subpoena directed to INA; Email with staff regarding service of subpoena on registered agent for TIG; Email with Michael A. Matteo regarding entity for service with regard to AIG.	0.10	925.00	\$92.50
10/31/2022	GNB	BL	Review edits to TIG subpoena package; Review email from Mark Plevin regarding subpoena to INA.	0.10	925.00	\$92.50
10/31/2022	IAWN	BL	Exchange emails with Robert Saunders re research	0.20	1295.00	\$259.00
10/31/2022	IAWN	BL	Research Rockefeller issue	0.10	1295.00	\$129.50
10/31/2022	IAWN	BL	Review S. Gershowitz email re coverage counsel for Rockefeller University	0.10	1295.00	\$129.50
10/31/2022	MAM	BL	Email to Gillian N. Brown regarding status of 2004 subpoena to American International Group, Inc.	0.20	460.00	\$92.00
10/31/2022	MAM	BL	Email to Gillian N. Brown regarding status of 2004 subpoena to TIG Insurance.	0.10	460.00	\$46.00
10/31/2022	RMS	BL	Legal research regarding insurance policies	2.10	1025.00	\$2,152.50
				<b>72.20</b>		<b>\$60,892.50</b>

**Case Administration [B110]**

10/03/2022	GNB	CA	Email Beth D. Dassa regarding calendaring and local rules.	0.10	925.00	\$92.50
10/03/2022	BDD	CA	Attend to calendaring matters with B. Anavim and M. Kulick.	0.20	495.00	\$99.00
10/04/2022	BDD	CA	Emails B. Anavim re several calendaring matters.	0.20	495.00	\$99.00



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10/06/2022	BDD	CA	Attend to calendaring matters and email G. Brown re same.	0.10	495.00	\$49.50
10/07/2022	BDD	CA	Attend to calendaring matters.	0.10	495.00	\$49.50
10/10/2022	BDD	CA	Attend to several calendaring matters with B. Anavim and M. Kulick, and email G. Brown re same.	0.20	495.00	\$99.00
10/19/2022	BDD	CA	Review various continued matters and attend to calendaring regarding the same.	0.20	495.00	\$99.00
10/24/2022	BDD	CA	Attend to calendaring matters.	0.10	495.00	\$49.50
10/26/2022	GNB	CA	Coordinate with internal team on filing of opposition to DIP motion.	0.10	925.00	\$92.50
10/26/2022	BDD	CA	Attend to calendaring matters with B. Anavim and M. Kulick.	0.20	495.00	\$99.00
10/28/2022	GNB	CA	Email with internal team regarding filing on Sunday deadline when ECF will be down.	0.10	925.00	\$92.50
10/31/2022	GNB	CA	Email calendaring team regarding shifting motion practice deadlines.	0.10	925.00	\$92.50
10/31/2022	BDD	CA	Attend to calendaring matters and emails G. Brown, B. Anavim and M. Kulick re same.	0.20	495.00	\$99.00
				<b>1.90</b>		<b>\$1,112.50</b>

#### **Claims Admin/Objections[B310]**

10/16/2022	GNB	CO	Email James I. Stang and John W. Lucas regarding email from Debtor's counsel regarding abuse claims.	0.10	925.00	\$92.50
10/18/2022	JWL	CO	Review of claims register summary prepared by Epiq (.6); review of claims filed by survivors against debtor and prepare summaries for each and send to respective counsel (1.4);	2.00	1095.00	\$2,190.00
				<b>2.10</b>		<b>\$2,282.50</b>

#### **Compensation Prof. [B160]**

10/04/2022	GNB	CP	Email Beth D. Dassa with instructions for certificate of no objection regarding PSZJ's July and August 2022 fee statements and form for same.	0.10	925.00	\$92.50
10/05/2022	GNB	CP	Revise and edit CNO re PSZJ's July and August 2022 fee statements (.2); Email John W. Lucas and Beth D. Dassa regarding instructions for same (.1).	0.30	925.00	\$277.50

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10/06/2022	BDD	CP	Prepare Certificate of No Objection re PSZJ July and Aug 2022 monthly fee statements (.50); emails G. Brown and N. Brown re same (.20).	0.70	495.00	\$346.50
10/12/2022	BDD	CP	Prepare draft fee statement for PSZJ (Sept. 2022) and email G. Brown re same.	0.40	495.00	\$198.00
10/12/2022	BDD	CP	Email G. Brown re prep of PSZJ September fee statement.	0.10	495.00	\$49.50
10/13/2022	BDD	CP	Emails J. Lucas and G. Brown re certificate of no opposition for PSZJ July and Aug fee statements.	0.10	495.00	\$49.50
10/20/2022	GNB	CP	Email with John W. Lucas regarding PSZJ fee statement for September 2022 and CNO regarding July and August 2022 fee statements; Email Sophia Lee regarding filing of PSZJ fee statement for September 2022.	0.10	925.00	\$92.50
10/20/2022	BDD	CP	Email G. Brown re PSZJ September monthly fee statement.	0.10	495.00	\$49.50
10/21/2022	GNB	CP	Email Sophia Lee regarding filing and service instructions for certificate of no objection to PSZJ July and August 2022 fee statements.	0.10	925.00	\$92.50
10/21/2022	GNB	CP	Revise and edit PSZJ's third fee statement (September 2022).	0.10	925.00	\$92.50
10/24/2022	GNB	CP	Revise and edit PSZJ third fee statement (September 2022) (.2); Email Sophia Lee regarding filing and service instructions (.1).	0.30	925.00	\$277.50
10/24/2022	BDD	CP	Email G. Brown re revisions to PSZJ September fee application.	0.10	495.00	\$49.50
10/24/2022	BDD	CP	Email G. Brown re PSZJ 2nd and 3rd interim fee statements (Aug/Sept 2022).	0.10	495.00	\$49.50
10/25/2022	BDD	CP	Email G. Brown re PSZJ first quarterly fee application.	0.10	495.00	\$49.50
10/31/2022	GNB	CP	Email with John W. Lucas regarding PSZJ fee statement payments.	0.10	925.00	\$92.50
				<b>2.80</b>		<b>\$1,859.00</b>

**Financing [B230]**

10/03/2022	GNB	FN	Briefly review August 2022 monthly operation report; Email IslandDundon regarding same.	0.10	925.00	\$92.50
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10/03/2022	MBL	FN	Email J. Lucas re DIP loan status.	0.10	1275.00	\$127.50
10/03/2022	BDD	FN	Email G. Brown re DIP financing motion and calendaring matters.	0.10	495.00	\$49.50
10/11/2022	MBL	FN	Email J. Lucas re DIP and case status (0.2); email J. Lucas re appraisals and review same (0.2).	0.40	1275.00	\$510.00
10/14/2022	GNB	FN	E-mail with Hung Phan regarding filing and service list/courtesy copies for opposition to DIP motion.	0.10	925.00	\$92.50
10/14/2022	BDD	FN	Email G. Brown re DIP motion.	0.10	495.00	\$49.50
10/14/2022	BDD	FN	Email J. Lucas re filing of opposition to DIP motion.	0.10	495.00	\$49.50
10/14/2022	JWL	FN	Call with A. Kornberg regarding DIP Motion (.2); email to PSZJ regarding same (.2);	0.40	1095.00	\$438.00
10/15/2022	MBL	FN	Review revised proposed DIP order; email J. Lucas re same.	0.20	1275.00	\$255.00
10/18/2022	BDD	FN	Email G. Brown re continued hearing on DIP financing motion.	0.10	495.00	\$49.50
10/21/2022	IAWN	FN	Review DIP motion	0.20	1295.00	\$259.00
10/24/2022	MBL	FN	Confer with J. Lucas re new DIP agreement.	0.10	1275.00	\$127.50
10/24/2022	BDD	FN	Review Notice re DIP Financing with Carver Federal Savings Bank and attend to calendaring matters re same.	0.10	495.00	\$49.50
10/25/2022	JIS	FN	Call J. Lucas regarding financing terms in counteroffer (.50); telephone call with Island Dundon and J. Lucas re DIP (1.0)	1.50	1525.00	\$2,287.50
10/25/2022	MBL	FN	Review new loan agreement.	0.50	1275.00	\$637.50
10/25/2022	MBL	FN	Emails with J. Lucas re new loan agreement.	0.20	1275.00	\$255.00
10/25/2022	JWL	FN	Call with Madison's counsel regarding release of Navy Yard under DIP and exit loan (.4); call with J. Stang regarding DIP and Navy Yard (.5); review DIP commitment letter (.8); review email from Dundon/Island regarding expense projections and respond to the same (.9); call with J. Stang and Island/Dundon team regarding DIP (1.0);	3.60	1095.00	\$3,942.00
10/26/2022	MBL	FN	Review emails with team and advisors re new DIP loan; review term sheet.	0.30	1275.00	\$382.50
10/27/2022	MBL	FN	Continue review of DIP loan documents.	0.30	1275.00	\$382.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/27/2022	MBL	FN	Email J. Lucas re DIP objection issues.	0.20	1275.00	\$255.00
10/28/2022	IAWN	FN	Review John Lucas email re Carver	0.10	1295.00	\$129.50
10/28/2022	JIS	FN	Review DIP objection.	0.50	1525.00	\$762.50
10/28/2022	MBL	FN	Further review of Carver loan documents, commitment letter, and proposed DIP order.	2.00	1275.00	\$2,550.00
10/28/2022	MBL	FN	Revise and update DIP objection re Carver loan.	2.30	1275.00	\$2,932.50
10/28/2022	MBL	FN	Email J. Lucas re financing status.	0.10	1275.00	\$127.50
				<b>13.70</b>		<b>\$16,793.50</b>

**General Creditors Comm. [B150]**

10/02/2022	GNB	GC	Email John W. Lucas regarding proposed agenda items for tomorrow's weekly Committee call.	0.10	925.00	\$92.50
10/03/2022	GNB	GC	Attend Committee meeting via video conference.	0.70	925.00	\$647.50
10/03/2022	GNB	GC	Review edits to abuse claims spreadsheet and email Sophia Lee regarding same.	0.10	925.00	\$92.50
10/03/2022	IAWN	GC	Telephone conference with Committee re mediation	0.70	1295.00	\$906.50
10/03/2022	JWL	GC	Prepare for (.3); and attend weekly committee member meeting (.7);	1.00	1095.00	\$1,095.00
10/04/2022	GNB	GC	Email Committee regarding business for next Committee meeting.	0.10	925.00	\$92.50
10/04/2022	GNB	GC	Review childhood sexual abuse claims data from Levy Konigsberg; Email Tiffany Cruz regarding same; Email Sophia Lee regarding same.	0.10	925.00	\$92.50
10/05/2022	GNB	GC	Access Epiq platform for filed claims per request of Kathryn Tran at Epiq.	0.10	925.00	\$92.50
10/05/2022	GNB	GC	Amend minutes of September 26, 2022 Committee meeting.	0.10	925.00	\$92.50
10/10/2022	IAWN	GC	Review agenda from Gillian Brown	0.10	1295.00	\$129.50
10/10/2022	MSP	GC	Attend Committee meeting.	1.80	1095.00	\$1,971.00
10/10/2022	MSP	GC	Email John W. Lucas re: Committee meeting.	0.10	1095.00	\$109.50
10/10/2022	JWL	GC	Call with J. Amala regarding strategy for term sheet (.5); call with T. Rizvi, S. Landgraber regarding liquidation analysis for settlement term sheet (.8); review documents in preparation for committee call	6.00	1095.00	\$6,570.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding settlement term sheet (1.5); attend committee call regarding counter settlement offer (1.8); revise settlement term sheet in response to comments from Committee (1.4);			
10/11/2022	JIS	GC	Call with J. Lucas regarding revisions to counteroffer.	0.40	1525.00	\$610.00
10/11/2022	JIS	GC	Review proposed counteroffer.	0.30	1525.00	\$457.50
10/11/2022	JWL	GC	Call with J. Stang regarding counter settlement term sheet (.4); review and revise the same (1.0);	1.40	1095.00	\$1,533.00
10/17/2022	JIS	GC	Attend committee meeting.	1.40	1525.00	\$2,135.00
10/17/2022	JWL	GC	Prepare agenda for weekly committee call (.5); attend weekly committee call regarding case status (1.4);	1.90	1095.00	\$2,080.50
10/18/2022	GNB	GC	Email John W. Lucas regarding state court counsel's claims.	0.10	925.00	\$92.50
10/19/2022	JWL	GC	General strategy call with G. Novod (.3); strategy call with A. Raphael (.4);	0.70	1095.00	\$766.50
10/20/2022	JWL	GC	Prepare for strategy meeting with state counsel regarding term sheet (.5); attend the foregoing meeting (.8); revise settlement term sheet and send to counsel for review and comment (.5);	1.80	1095.00	\$1,971.00
10/24/2022	IAWN	GC	Telephone conference with Committee (partial)	0.50	1295.00	\$647.50
10/24/2022	JWL	GC	Attend committee meeting regarding case update and Madison counteroffer (1.3); review Madison counteroffer term sheet (.5); revise the same (1.2);	3.00	1095.00	\$3,285.00
10/25/2022	JWL	GC	Prepare summary of case update for committee regarding term sheet negotiation and next steps (1.0);	1.00	1095.00	\$1,095.00
10/26/2022	JWL	GC	Call with counsel to committee members regarding revised term sheet (.8); review and revise term sheet (1.0); call with R. Liguori regarding term sheet (.2); review emails from and respond to committee members' counsel regarding changes to term sheet (1.4);	3.40	1095.00	\$3,723.00
10/27/2022	IAWN	GC	Telephone conference with state court counsel (partial attendance)	0.50	1295.00	\$647.50
10/27/2022	JWL	GC	Revise settlement term sheet and send email to committee members' counsel regarding next steps (.6); further emails with committee regarding target	2.90	1095.00	\$3,175.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			for term sheet (.8); prepare for (.3); and attend call with committee and counsel regarding term sheet (1.0); another call with R. Liguori regarding term sheet (.2);			
10/28/2022	GNB	GC	Email state court counsel regarding status of Rule 2004 subpoenas for production of documents.	0.10	925.00	\$92.50
10/28/2022	GNB	GC	Review John W. Lucas email regarding debtor's exclusivity motion, DIP motion, and settlement issues; Email John W. Lucas regarding debtor exclusivity.	0.10	925.00	\$92.50
10/28/2022	JWL	GC	Update email to committee regarding term sheet and next steps (.8); call with G. Daniello regarding term sheet (.5); email to R. Vespi regarding same (.4);	1.70	1095.00	\$1,861.50
10/31/2022	IAWN	GC	Respond to state court counsel re coverage counsel	0.10	1295.00	\$129.50
10/31/2022	JIS	GC	Attend committee call.	1.10	1525.00	\$1,677.50
10/31/2022	JIS	GC	Call J. Lucas and T. Rizvi re follow up to call with committee.	0.20	1525.00	\$305.00
10/31/2022	JIS	GC	Call with J. Lucas concerning Committee issues.	0.70	1525.00	\$1,067.50
10/31/2022	JWL	GC	Case update call with J. Stang (.7);	0.70	1095.00	\$766.50
10/31/2022	JWL	GC	Prepare for (.2); and attend weekly committee call regarding case update and term sheet progress (1.1); follow up call with J. Stang and T. Rizvi regarding term sheet (.2);	1.50	1095.00	\$1,642.50
				<b>36.50</b>		<b>\$41,838.50</b>

### Hearings

10/12/2022	IAWN	H	Prepare for hearing re Rule 2004 motion	1.30	1295.00	\$1,683.50
10/13/2022	IAWN	H	Telephone call with Malhar Pagay re hearing	0.10	1295.00	\$129.50
10/13/2022	IAWN	H	Attend hearing re Rule 2004 motion	1.00	1295.00	\$1,295.00
10/13/2022	IAWN	H	Prepare for hearing re Rule 2004 motion	0.40	1295.00	\$518.00
				<b>2.80</b>		<b>\$3,626.00</b>

### Mediation

10/03/2022	GNB	ME	Review emails from John W. Lucas and from Matthew Dundon regarding mediation logistics.	0.10	925.00	\$92.50
10/03/2022	JWL	ME	Prepare for Oct. 6 mediation (1.5); call with S.	1.80	1095.00	\$1,971.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Landgraber and T. Rizvi regarding Oct. 6 mediation (.3);			
10/04/2022	GNB	ME	Email with Miriam Levi regarding Paul Weiss forms for mediation participation; Email Iain A.W. Nasatir and John W. Lucas regarding same; Review order entered today at Docket No. 224.	0.10	925.00	\$92.50
10/04/2022	JWL	ME	Prepare for Oct. 6 mediation	1.20	1095.00	\$1,314.00
10/05/2022	GNB	ME	Research factual issue relating to sexual abuse claims for Iain A.W. Nasatir and John W. Lucas during today's mediation.	0.20	925.00	\$185.00
10/05/2022	GNB	ME	Review Debtor's mediation settlement proposal.	0.10	925.00	\$92.50
10/05/2022	GNB	ME	Email Iain A.W. Nasatir, Malhar S. Pagay, and John W. Lucas regarding Paul Weiss question re BGCA.	0.20	925.00	\$185.00
10/06/2022	IAWN	ME	Attend mediation	8.50	1295.00	\$11,007.50
10/06/2022	JWL	ME	Attend in person mediation session in New York (8.5); work on mediation counter proposal (.6); meeting with T. Rizvi regarding formation of settlement term sheet (1.5);	10.60	1095.00	\$11,607.00
10/07/2022	MSP	ME	Attention to formulation of global settlement terms, liquidation analysis, etc. (.2); email exchange with John W. Lucas, T. Rizvi, et al. re: same (.20).	0.40	1095.00	\$438.00
10/07/2022	JWL	ME	Review and revise proposed settlement term sheet (.8); review and respond to email from committee members' individual counsel regarding settlement terms (1.0);	1.80	1095.00	\$1,971.00
10/08/2022	IAWN	ME	Revise John Lucas term sheet comments	0.10	1295.00	\$129.50
10/08/2022	MSP	ME	Email exchange with T. Rizvi, John W. Lucas, et al. re: analysis to support mediation discussions.	0.40	1095.00	\$438.00
10/08/2022	JWL	ME	Further changes to settlement term sheet and prepare summary of the same for counsel to committee members (2.7);	2.70	1095.00	\$2,956.50
10/09/2022	JWL	ME	Prepare email to committee regarding outline of settlement counteroffer (.3);	0.30	1095.00	\$328.50
10/10/2022	GNB	ME	E-mail with PSZJ team regarding settlement counteroffer.	0.10	925.00	\$92.50
10/10/2022	IAWN	ME	Review liquidation analysis	0.10	1295.00	\$129.50
10/10/2022	IAWN	ME	Review Gillian Brown email re counter offer	0.10	1295.00	\$129.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/10/2022	IAWN	ME	Exchange emails with John Lucas with comments to term sheet	0.40	1295.00	\$518.00
10/10/2022	IAWN	ME	Telephone conference with Committee re mediation demand	1.80	1295.00	\$2,331.00
10/10/2022	IAWN	ME	Exchange emails with J. Freeman re term sheet	0.10	1295.00	\$129.50
10/10/2022	IAWN	ME	Review J. Freeman comments to offer	0.10	1295.00	\$129.50
10/10/2022	IAWN	ME	Email with John Lucas re mediation demand	0.10	1295.00	\$129.50
10/10/2022	JIS	ME	Email J. Lucas regarding Committee meeting on counter offer.	0.20	1525.00	\$305.00
10/10/2022	JIS	ME	Telephone conference with mediator and PSZJ	0.80	1525.00	\$1,220.00
10/11/2022	IAWN	ME	Telephone call with mediator, J. Stang and J. Lucas	0.80	1295.00	\$1,036.00
10/11/2022	JWL	ME	Attend mediation call with mediator, J. Stang, and I. Nasatir regarding settlement terms (.8); prepare and send mediation response to Mediator regarding counter offer (.6); email to committee regarding mediation session with mediator regarding term sheet (.6);	2.00	1095.00	\$2,190.00
10/12/2022	JWL	ME	Call with A. Kornberg regarding Oct. 13 mediation (.3); prepare for Oct. 13 mediation (.7);	1.00	1095.00	\$1,095.00
10/13/2022	IAWN	ME	Telephone call with mediator	2.40	1295.00	\$3,108.00
10/13/2022	JIS	ME	Mediation call with Debtor and Mediator.	2.40	1525.00	\$3,660.00
10/13/2022	JWL	ME	Mediation call with mediator, Madison, and Committee members, Paul Weiss, and financial advisors (2.4);	2.40	1095.00	\$2,628.00
10/14/2022	JIS	ME	Attend mediation.	0.70	1525.00	\$1,067.50
10/14/2022	JWL	ME	Call with J. Eisen regarding DIP motion and mediation issues (.4);	0.40	1095.00	\$438.00
10/18/2022	IAWN	ME	Review term sheet re defense costs	0.10	1295.00	\$129.50
10/18/2022	IAWN	ME	Telephone conference with John Lucas re term sheet	0.20	1295.00	\$259.00
10/18/2022	IAWN	ME	Review term sheet re discovery	0.20	1295.00	\$259.00
10/18/2022	JIS	ME	Call J. Lucas regarding Madison term sheet.	0.60	1525.00	\$915.00
10/18/2022	JWL	ME	Call with J. Stang regarding Madison's revised term sheet (.6); call with I. Nasatir regarding same (.2); review term sheet and send summary to committee	2.30	1095.00	\$2,518.50



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			and counsel (1.0); respond to follow up questions from committee and counsel (.5);			
10/19/2022	IAWN	ME	Telephone call with Judge Chapman re mediation	0.30	1295.00	\$388.50
10/19/2022	IAWN	ME	Telephone call with mediator	1.50	1295.00	\$1,942.50
10/19/2022	JIS	ME	Committee call with Mediator and state court counsel.	1.50	1525.00	\$2,287.50
10/19/2022	JIS	ME	Call with mediator regarding term sheet.	0.50	1525.00	\$762.50
10/19/2022	JWL	ME	Call with J. Eisen regading Oct. 19 mediation (.3); attend Oct. 19 mediation (1.5);	1.80	1095.00	\$1,971.00
10/20/2022	IAWN	ME	Exchange emails with John Lucas re counter-offer	0.10	1295.00	\$129.50
10/20/2022	IAWN	ME	Review John Lucas email re counter-offer	0.10	1295.00	\$129.50
10/20/2022	JIS	ME	Call with mediator and John Lucas.	0.80	1525.00	\$1,220.00
10/20/2022	JIS	ME	Meeting with state court counsel regarding counteroffer.	0.80	1525.00	\$1,220.00
10/20/2022	JIS	ME	Review mediator proposals regarding open term sheet issues.	0.10	1525.00	\$152.50
10/20/2022	JIS	ME	Review counteroffer from Committee.	0.10	1525.00	\$152.50
10/20/2022	JWL	ME	Call with Mediator and J. Stang regarding global resolution with Madison (.8);	0.80	1095.00	\$876.00
10/21/2022	IAWN	ME	Telephone conference with Judge Chapman	0.30	1295.00	\$388.50
10/21/2022	IAWN	ME	Email with John Lucas re Judge Chapman telephone call	0.10	1295.00	\$129.50
10/21/2022	JIS	ME	Call with J. Lucas re call with mediator on counteroffer.	0.20	1525.00	\$305.00
10/21/2022	JWL	ME	Call with Mediator and I. Nasatir regarding settlement counteroffer (.3); call with G. Novod regarding term sheet discussion (.2); emails with committee regarding same (.5); call with J. Stang re same (.2)	1.20	1095.00	\$1,314.00
10/23/2022	GNB	ME	Email John W. Lucas regarding mediation issue for J. Chapman.	0.10	925.00	\$92.50
10/24/2022	GNB	ME	Briefly review counteroffer and email John W. Lucas regarding same.	0.10	925.00	\$92.50
10/24/2022	JIS	ME	Committee call re counter offer.	1.20	1525.00	\$1,830.00

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10/24/2022	JIS	ME	Call with J. Lucas after his call to mediator.	0.10	1525.00	\$152.50
10/24/2022	JIS	ME	Review Madison counteroffer with John Lucas.	0.20	1525.00	\$305.00
10/24/2022	JIS	ME	Call J. Lucas regarding status of Madison counteroffer.	0.10	1525.00	\$152.50
10/24/2022	JWL	ME	Review Madison counteroffer (.3); call with Judge Chapman regarding the same (.2); calls with J. Stang re same (.4)	0.90	1095.00	\$985.50
10/25/2022	JIS	ME	Call J. Amala regarding status of mediation.	0.70	1525.00	\$1,067.50
10/25/2022	JWL	ME	Call with Mediator regarding term sheet and Navy Yard (.2);	0.20	1095.00	\$219.00
10/26/2022	IAWN	ME	Email with John Lucas re term sheet	0.10	1295.00	\$129.50
10/26/2022	JWL	ME	Respond to mediation inquiry from Mediator regarding term sheet (.5); call with mediator regarding the same (.2);	0.70	1095.00	\$766.50
10/27/2022	JWL	ME	Call with mediator regarding term sheet (.4); call with mediator and A. Kornberg regarding term sheet issues (.7);	1.10	1095.00	\$1,204.50
10/28/2022	JIS	ME	Call with J. Lucas regarding status of meetings with mediator and state court counsel re counter offer.	0.30	1525.00	\$457.50
10/28/2022	JWL	ME	Call with J. Stang re mediation counteroffer	0.30	1095.00	\$328.50
10/30/2022	GNB	ME	Respond to John W. Lucas email regarding settlement issue.	0.10	925.00	\$92.50
				<b>64.20</b>		<b>\$78,471.00</b>

#### Non-Working Travel

10/05/2022	IAWN	NT	Travel from California to New York to attend mediation (9 hours at 50%)	4.50	1295.00	\$5,827.50
10/05/2022	JWL	NT	Travel to NY from San Francisco for Oct. 6 mediation session (8 hours at 50%)	4.00	1095.00	\$4,380.00
10/06/2022	IAWN	NT	Travel from New York to California (9 hours at 50%)	4.50	1295.00	\$5,827.50
				<b>13.00</b>		<b>\$16,035.00</b>

#### Plan & Disclosure Stmt. [B320]

10/28/2022	JWL	PD	Review exclusivity motion (.2); call with J. Weber	0.40	1095.00	\$438.00
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**Ret. of Prof./Other**

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### Expenses

08/08/2022	DC	Delivery/ Courier Service [E107] Mobile Parcel Carriers, Inv. 235711, Delivery to NY, S. Winns	20.00
08/08/2022	DC	Delivery/ Courier Service [E107] Mobile Parcel Carriers, Inv. 235711, Delivery to J. Chapman, West Hampton Beach, S. Winns	495.17
09/21/2022	OS	Mobile Parcel Carriers Inc., Inv. #236632, S. Winns	89.00
09/29/2022	DC	Delivery/ Courier Service [E107] Nationwide Legal, Inv. 00000048750, J. Washington - subpoena service	1,227.80
09/29/2022	DC	Delivery/ Courier Service [E107] Nationwide Legal, Inv. 00000048750, J. Washington - subpoena service	214.80
09/29/2022	DC	Delivery/ Courier Service [E107] Nationwide Legal, Inv. 00000048750, J. Washington - subpoena service	477.00
10/04/2022	BB	54162.00004 Bloomberg Charges through 10-04-22	10.00
10/04/2022	FE	54162.00004 FedEx Charges for 10-04-22	23.55
10/04/2022	FE	54162.00004 FedEx Charges for 10-04-22	23.55
10/04/2022	PO	U.S. Postage	13.40
10/04/2022	RE	( 66 @0.10 PER PG)	6.60
10/04/2022	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
10/04/2022	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
10/05/2022	FE	54162.00004 FedEx Charges for 10-05-22	23.55
10/05/2022	FE	54162.00004 FedEx Charges for 10-05-22	23.55
10/07/2022	FE	54162.00004 FedEx Charges for 10-07-22	23.55
10/07/2022	FE	54162.00004 FedEx Charges for 10-07-22	23.55
10/07/2022	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
10/07/2022	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/07/2022	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
10/07/2022	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/12/2022	FE	54162.00004 FedEx Charges for 10-12-22	25.29
10/12/2022	FE	54162.00004 FedEx Charges for 10-12-22	25.29
10/12/2022	RE	( 30 @0.10 PER PG)	3.00
10/12/2022	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
10/12/2022	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
10/12/2022	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/12/2022	RE2	SCAN/COPY ( 27 @0.10 PER PG)	2.70
10/21/2022	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20

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10/21/2022	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
10/21/2022	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/21/2022	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
10/21/2022	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
10/21/2022	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
10/24/2022	FE	54162.00004 FedEx Charges for 10-24-22	24.04
10/24/2022	FE	54162.00004 FedEx Charges for 10-24-22	24.04
10/24/2022	FE	54162.00004 FedEx Charges for 10-24-22	24.04
10/24/2022	PO	U.S. Postage	3.60
10/24/2022	RE	( 102 @0.10 PER PG)	10.20
10/24/2022	RE	( 51 @0.10 PER PG)	5.10
10/24/2022	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
10/24/2022	RE2	SCAN/COPY ( 43 @0.10 PER PG)	4.30
10/28/2022	LN	54162.00004 Lexis Charges for 10-28-22	47.41
10/31/2022	OS	N Kosearas Group, Inv. 1276, J. Washington	45.00
10/31/2022	RS	Research [E106] Everlaw, Inv. 67412	500.00
<b>Total Expenses for this Matter</b>			<b>\$3,451.38</b>

Pachulski Stang Ziehl & Jones LLP  
Madison Square BGC O.C.C.  
54162 -00004

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Invoice 131231  
October 31, 2022

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**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 10/31/2022**

<b>Total Fees</b>	<b>\$225,732.50</b>
<b>Total Expenses</b>	<b>3,451.38</b>
<b>Less Courtesy Discount</b>	<b>\$52,412.50</b>
<b>Total Due on Current Invoice</b>	<b>\$176,771.38</b>

**Outstanding Balance from prior invoices as of 10/31/2022 (May not include recent payments)**

<b><u>A/R Bill Number</u></b>	<b><u>Invoice Date</u></b>	<b><u>Fees Billed</u></b>	<b><u>Expenses Billed</u></b>	<b><u>Balance Due</u></b>
130635	07/31/2022	\$127,920.00	\$291.19	\$35,846.72
130861	08/31/2022	\$198,760.00	\$4,027.47	\$202,787.47
131167	09/30/2022	\$134,060.00	\$1,599.53	\$135,659.53

<b>Total Amount Due on Current and Prior Invoices:</b>	<b>\$551,065.10</b>
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